

IND182 – Mark Michaels

20140929-5058 FERC PDF (Unofficial) 9/29/2014 7:35:19 AM

Mark Michaels
427 Spring Drive
Yorktown Heights, NY 10598

September 28, 2014

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Algonquin Incremental Market Project, Docket No. CP14-96-000

IND182-1

I am making these comments under protest. FERC's approval process and Draft Environmental Impact Statement (DEIS) are fundamentally flawed. I demand that the DEIS be withdrawn and that a Supplemental Draft Environmental Impact Statement be submitted for public review only after all relevant parties have submitted all necessary information.

IND182-1

See the responses to comments FA4-1 and SA1-12.

IND182-2

I will begin by pointing to a telling error in the DEIS related to the Town of Yorktown. Page 4-157 of the DEIS characterizes parkland in Yorktown as follows: "Sylvan Glen Park Preserve also referred to by commentators (*sic.*) as Granite Knolls West". This is to be the location of a launcher/receiver and pressure regulating facility and a ware yard. Granite Knolls Park West and Sylvan Glen Preserve are in fact separate parcels of parkland that barely abut one another. It appears that alienation of parkland in both parks would be required for this project. If the DEIS does not accurately describe the impacted properties at such a basic level, when correct information is readily available, how can the general public trust its accuracy with regard to more complex, technical matters?

IND182-2

See the responses to comments SA4-14, LA5-15, and FL8-2.

According to the DEIS, the alienation of parkland involved would be *de minimis*: "In particular, minor uses of parkland for nonpark purposes that do not interfere with public use do not require legislative approval. In addition, construction projects of less than 1 year generally do not constitute alienations, particularly when park uses can continue to go on around the construction" (citations omitted.) It's patently false and misleading to describe the permanent alienation of 1 acre of undeveloped parkland for the construction of an industrial facility and the decimation of more than fifteen additional acres, which will be impossible to restore, as *de minimis*. And it's absurd to suggest that converting more than 16 acres of undeveloped parkland to industrial use for any period of time, let alone a period of years, "will not interfere with the public use." It also merits pointing out that the DEIS does not include a specific plan for the restoration of this alienated parkland.

IND182 – Mark Michaels (cont'd)

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IND182-2
(cont'd)

The language of the DEIS itself makes it clear that the use of Yorktown parkland will lead to a "substantial intrusion on parkland for non-park purposes", the relevant legal standard. "Construction activities, noise, and dust would impact recreational use of this area." These activities would require the placement of timber mats over the High Quarry and Turtle Pond trails, as requested by the town, in order to keep them open during construction." In addition, the installation of safety fencing and signage, and regular watering to control fugitive (and potentially toxic) dust are contemplated by the DEIS.

Members of the Town Board in Yorktown – with Spectra's connivance – attempted and failed to obtain legislative approval to alienate many acres of this very parkland. The initial resolution passed by the Town Board included the following provisions:

WHEREAS, the Project will require AGT to construct certain new above-grade facilities on approximately one-acre of the Park adjacent to the existing easement area, temporarily utilize 15.4 acres for a contractor ware yard, and require approximately eight acres of temporary work space adjacent to the existing easement to facilitate construction work along the existing pipeline right-of-way; and

WHEREAS, AGT seeks a permanent easement on Parcel E for the above-grade facility and a temporary, three-year construction permit on Parcels A, B, C, D, and E .
..

The DEIS states: "Algonquin is working with Yorktown on the temporary use of this property during construction."

The resolution stating that a full acre would be permanently alienated and 23.4 acres would be temporarily alienated for three years (not less than one year as the DEIS alleges) and the explicit statement that Yorktown and Algonquin are working together also make it abundantly clear that the *de minimis* statement in the DEIS is false and that the claim is not being made in good faith.

Why did the Yorktown Supervisor and Spectra try to sneak a resolution requesting parkland alienation through the Town Board without a public hearing or meaningful public discussion of the issue?

It's a matter of public record that the Town of Yorktown wants to have a major sports complex constructed on the site and made a deal with Spectra for the construction of this facility in exchange for the alienation of parkland. The DEIS is silent with respect to this arrangement.

The Town of Yorktown recently passed a resolution seeking further study of the pipeline project. Yorktown Supervisor Grace and Councilman Terrence Murphy removed a provision opposing parkland alienation before the measure was approved.

IND182 – Mark Michaels (cont'd)

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IND182-2 (cont'd)	<p>In light of these facts, what is the relationship between Spectra and the Town of Yorktown?</p> <p>Are Yorktown and Algonquin still working together, and if so, what other agreements have been reached?</p> <p>The Town of Yorktown will not disclose if any other agreements have been reached with Spectra, and the DEIS is silent on this matter. Phrases such as "working with" are facially insufficient, since they render meaningful public comment impossible. The DEIS cannot be complete if it does not explain what alternative arrangements, if any, have been made for the placement of the ware yard and launcher/receiver and pressure regulating facility, what the location(s) will be, and what impacts and costs that construction will involve.</p>
IND182-3	<p>Yorktown seems to be ground zero for attempts to evade the requirements of NEPA and the New York State Environmental Quality Review Act (SEQRA). The Algonquin Pipeline Expansion terminates at Stony Street (at the edge of <i>Granite Knolls Park West</i>). On the same day that the comment period closes, Spectra is holding an informational meeting in Yorktown to discuss the next phase, known as the Atlantic Bridge project, which begins where Algonquin ends and bisects the remainder of Yorktown, passing through Granite Knolls Park East. This is the same project, and the same pipe, and giving it a different name does nothing to alter that fact.</p> <p>The Sylvan Glen Preserve-Granite Knolls Park West-Granite Knolls Park East complex has been recognized as an important and highly sensitive location in terms of biodiversity and the entire region's environment http://www.yorktownny.org/sites/default/files/fileattachments/planning/page/212/chbp-lo-res1.pdf (p. 23). This segmentation of the project is almost certainly a violation of NEPA's requirement that projects be evaluated in their entirety.</p>
IND182-4	<p>Why are the DEIS and FERC condoning this segmentation?</p> <p>Why is the project being segmented?</p>
IND182-5	<p>Why is the segmentation centered in Yorktown, and why does it involve a highly sensitive area for biodiversity?</p>
IND182-6	<p>What consideration was given to the sensitivity of the Sylvan Glen Preserve and Granite Knolls Park West area when choosing that location for a launcher/receiver facility and a ware yard?</p> <p>Why does the DEIS minimize to the point of disregarding the environmental importance of the Sylvan Glen Preserve - Granite Knolls Park West area when the New York State DEC has recognized Croton to Highlands as an area of regional</p>

IND182-3 See the responses to comments FA3-5 and SA4-15.

IND182-4 See the response to comment FA3-5.

IND182-5 See the response to comment FA3-5.

IND182-6 Sylvan Glen Park Reserve and Granite Knolls Park West (parks) are discussed in section 4.8.5.1 of the EIS. As described in that section, Algonquin was granted a 50-foot-wide permeant easement by the Loyola Seminary in 1952, prior to the acquisition of the property by the town of Yorktown in 1981, when the property was turned into parkland. Algonquin's easement was not negated by the acquisition of the property by the town. Algonquin would install the new pipeline and launcher/receiver facility within the existing permanent easement and no new permanent right-of-way would be acquired. However, construction would require the clearing of a strip of mostly upland forest between 30 to 40 feet wide on the north side of the existing right-of-way. Some additional tree clearing would be required for a roughly 350 feet by 85 feet extra workspace on the west side of Stony Street and for nine ATWSs, roughly 100 feet by 35 feet, throughout the parks. The installation of the launcher/receiver facility on the west side of Stony Street would also introduce a new, low profile visual impact in a viewshed otherwise unaffected by aboveground ground structures. The launcher/receiver facility may be visible to passing motorist and pedestrians on or adjacent to Stony Street but would not have a significant impact on the overall visual character of the parks.

IND182 – Mark Michaels (cont'd)

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IND182-6
(conf'd)

conservation priority
http://www.dec.ny.gov/docs/lands_forests_pdf/osp09chapter5.pdf (p. 73)?

IND182-7

There are numerous other flaws in the DEIS that I'm sure will be addressed by people with the appropriate expertise. Accepting the DEIS in its current form makes a mockery of NEPA, the rights of the residents of this densely populated area. Expansion of the pipeline and the associated activities are likely to have a devastating impact on the local environment, the quality of life in the area, and on our biodiversity.

Again, I am submitting these comments under protest.

Sincerely,

Mark A. Michaels

IND182-7 See the response to comment FA4-1.

IND183 – Jennifer Klein

20140929-5016 FERC PDF (Unofficial) 9/28/2014 8:06:50 AM

Jennifer Klein, Fairfield, CT.
To whom it may concern:

IND183-1 | The proposed gas pipeline extension is not a good idea for the northeast.
IND183-2 | It will cross 67 water bodies and 86 wetlands in CT alone. Methane is 34
IND183-3 | times more potent in trapping carbon dioxide in the atmosphere and will
result in serious environmental and health risks. FERC's focus should be
on developing renewable energy, not switching from one dirty fossil fuel
to another. Please do not approve CP14-96-000..

Thank you,
Jennifer Klein
Fairfield, CT

IND183-1 | Comment noted. Sections 4.3.2 and 4.4.3 of the EIS discuss potential impacts on and mitigation measures for surface waters and wetlands.

IND183-2 | See the responses to comments FA4-23 and CO7-3.

IND183-3 | Comment noted. The FERC is responsible for reviewing applications from natural gas transmission companies seeking authorization to construct and operate interstate natural gas facilities. The FERC does not regulate the siting of "green energy" projects such as wind or solar energy collection farms, nor the development or regulation of energy conservation programs.

IND184 – Dmitriy Komin

20140929-5018 FERC PDF (Unofficial) 9/28/2014 1:24:12 PM

IND184-1 Dmitriy Komin, Maple Valley, WA.
As a former resident of Westchester County, NY and having close family in both the cities of New Rochelle (parents) and Somers (brother and family) in the county, I am very concerned about the fact that the current Algonquin Gas pipeline, and the proposed AIM expansion are located within 600 feet of the Indian Point Nuclear Power Station yet there is no independent assessment of the risk from AIM to IPEC that's been made available. After familiarizing with information published in the White Plains Journal News on Sept 15, 2014 and the work of independent energy consultant Paul Blanch (who has 40+ years of experience in nuclear safety) I am extremely concerned that the existing pipeline, or the expansion work under AIM creates deadly risks to Indian Point. Even if probability of gas line explosion is low, it is certainly possible and the results could be devastating to Westchester and other neighbors.

We cannot afford to have a Fukushima type disaster here in NY Tri-State area, and therefore we need an independent, thorough review of Indian Point safety with respect to AIM project. Mr. Blanch points out such a review has not been made public, instead blanket statement has been given so far by FERC so far that "the proposed route would not pose any new hazard to the (Indian Point) facility". Mr. Blanch raises the point that when similar safety study was conducted (as required by NRC) in New Mexico project in 2004 by Pramotome NRP, the outcome was that the pipeline there actually did pose "undue risk" and credible hazard. This is extremely concerning: New Mexico site has smaller pipeline capacity, is 3 times farther from a nuclear site, and is in a far less populated area, yet project was essentially deemed unsafe. Evaluating and publicly disclosing Algonquin and Indian Point safety, is therefore a very high priority.

We need more transparency here and a thorough safety evaluation that would address Mr. Blanch's specific concerns and assure residents that AIM project is not a road towards Fukushima. For example, he points out that (1)Spectra does not include automatic gas termination valves in AIM proposal, and (2)gas lines will not meet most stringent safety standards discussed in DOT regulations. Each of these concerns, as well as many others raised by Mr. Blanch, need to be thoroughly and scientifically addressed in a public disclosure before any AIM construction can begin.

As concerned citizen with family and deep roots in NY area, I urge you to halt approval of AIM project until a thorough independent safety study of its risks to Nuclear Point is conducted and made public. Right now, public safety is not at all assured, and I am concerned about the safety of my family in Westchester in particular and Northeast US residents in general.

IND184-1

See the responses to comments FA4-25 and SA14-11.

IND185 – Anne Fleche

20140929-5026 FERC PDF (Unofficial) 9/28/2014 8:43:51 PM

IND185-1 | Anne Fleche, West Roxbury, MA.
I request that you extend the comment period for this project beyond the September 29 deadline.

IND185-2 | Like others, I am disappointed not to have been granted a second hearing on this matter, and I believe a longer comment period is essential. We are concerned about the safety of this plan, which puts a gas line next to a quarry, and I am also opposed to any energy project that derives from fracking.

IND185-3 | Please consider extending the deadline so that all our neighbors can get a chance to respond.

Thank you,
Anne Fleche

IND185-1 See the response to comment FA6-5.

IND185-2 See the responses to comments FA6-1, FA6-5, and LA14-2.

IND185-3 See the response to comment FA6-5.

IND186 – Lauren Attinelly

20140929-5028 FERC PDF (Unofficial) 9/28/2014 9:32:24 PM	
Lauren Attinelly, Buchanan, NY. To Whom It May Concern:	
IND186-1	I am a resident of the Village of Buchanan and reside here with my husband and 2 children ages 15 and 12. We live on Pheasants Run which is in close proximity to the major areas that will be impacted by expansion of this pipeline. On behalf of my family and me, we ask that you reconsider this location for this pipeline expansion and disapprove of this project.
IND186-2	The Villages of Buchanan and Verplanck have had their fair share of challenges over the years - including the decline of real estate values primarily due to challenges in our Buchanan Verplanck Elementary school. The socio-economic mix of this school has caused people to move away from the area as well as choose to put their children in the other elementary schools. I have been very involved in the PTAs at leadership levels in our district. I was the PTA President during the years where Buchanan Verplanck elementary school was under lots of criticism for not meeting performance levels required by NY State. During that time - many chose to move their children away - thus creating extra costs in our district and over crowding in other buildings.
IND186-3	This school has enough challenges before having to worry about a site that will have major construction disruption let alone the risk of disaster. Indian Point provides enough risk at this time - and we don't need any further risks.
IND186-4	As a Buchanan resident - our roads are well traveled by our residents heading off to work each day and lots of activity to move our children to our schools. With major construction - there will be significant delays and bus routes will need to be reconfigured - again - causing more hemorrhaging of monies from our district that is already trying to do the most with continued declining tax revenue and aid from NY State.
IND186-5	Engery is a key part of our United States - but isn't it enough that is area has a Nuclear Power Plant. Do we really need to pile on more with this expanded gas pipeline. Do the right thing - SAY NO! Yours Truly, Lauren G. Attinelly

IND186-1 Comment noted.

IND186-2 Comment noted. Economic impacts associated with the Project, including property values are discussed in section 4.9.8 of the EIS. See also the response to comment LA23-21.

IND186-3 See the responses to comments FA4-25 and SA1-9.

IND186-4 Comment noted. Transportation and traffic-related impacts associated with the construction of the New York pipeline segments, including traffic management strategies, are described in section 4.9.5.1 and appendix G of the EIS.

IND186-5 Comment noted.

IND187 – Eleanor Dennis

20140929-5029 FERC PDF (Unofficial) 9/28/2014 10:10:18 PM	
IND187-1	<p>Eleanor Dennis, South Salem, NY.</p> <p>I have significant concerns about the Algonquin Pipeline Expansion Project's impacts on the environment, namely, the possibility of leaks, explosions and daily expulsions of gases from the compressors.</p> <p>Reports of citizens living near compressor stations and peer-reviewed scientific studies have shown that emissions from compressor stations and other shale gas infrastructure are associated with negative health impacts.</p> <p>There are regular reports of explosions and mishaps at compressor stations (just this week in Wyoming). It is unfair and unreasonable to expect taxpayers to bear the costs of additional emergency response actions, healthcare, damage to water supplies and other impacts. The pipeline company should bear the financial burden of any emergency responses caused by the compressor station or pipeline, and that should include training first responders in all nearby towns and providing proper equipment.</p>
IND187-2	<p>As a resident of the Town of Lewisboro, I and my fellow citizens are entitled to advanced notification of all planned blowdowns, either full or partial, and notification within 30 minutes following any unplanned partial or full blowdowns of the Stony Point and Southeast compressor stations and other gas pipeline infrastructure and operations (including but not limited to metering and regulating stations, pipelines, valves, fittings, and pigging operations) as well as immediate notification to the County of Westchester in order to alert all residents, police, fire departments and municipalities within Westchester County.</p>
IND187-3	<p>I also request that a comprehensive and transparent Health Impact Assessment (HIA), as outlined by the Centers for Disease Control and the National Academy of Sciences, be conducted by an independent entity acceptable to industry, local government officials, advocates and the public, and funded by Spectra Energy.</p>
IND187-4	<p>I oppose any construction of maintenance facilities or compressor stations located near schools, parks, houses of worship, business or residential districts or any other population.</p> <p>Thank you for considering these very serious concerns.</p>

IND187-1 See the responses to comments SA4-1, SA4-9, LA1-4, LA1-9, CO14-25, and CO14-54.

IND187-2 See the response to comment SA4-3.

IND187-3 See the response to comment SA4-10.

IND187-4 Comment noted.

IND188 – Karen Palmer

20140929-5030 FERC PDF (Unofficial) 9/29/2014 12:03:45 AM

IND188-1 Karen C. Palmer, Cumberland, RI.
I am a grandmother, beekeeper, and enjoy the great outdoors. I am
gravely concerned about the proposed extension of the Algonquin pipeline
and increase in capacity of the compressor station in Burrville, RI.
The impact on everyone's physical and mental health is too great and will
continue for the generations to come. From the start it has been eroding
away our health, longevity and joy of life that we had been working on
throughout our lives.

IND188-2 The energy needs are being more than adequately met at this moment in
time and the use of renewable energy resources is on the rise. It makes
no sense to expand the use of a fuel that is deleterious to our mental
and physical well-being. It makes more sense to use renewable resources
instead of expanding one that emits toxic agent & particulates into the
air which are carcinogenic, create irreversible respiratory problems &
poisons the water we drink & the air we breathe.

IND188-3 People have been experiencing health problems since the very
beginnings of the present facility. There used to be a bigger buffer
zone that would alleviate the impact of methane in the air. Expansion of
the electric power lines has reduced the amount of land available for
that purpose. Land value has plummeted & people's life savings and hope
for a well earned retirement have disappeared. It's time to invest in
the future. A better approach is to encourage the expansion of
renewable. The growth in employment is in the renewables too.

Methyl mercaptan or ethyl mercaptan is added to gas to help detect
leaks. The odor is offensive and can be painful to experience. Symptoms
include dizziness, headaches, vomiting, shivering & unconsciousness.
People with prolonged exposure may have symptoms similar to the flu.
These include severe headaches, fatigue, dizziness & nausea. Working in
hospitals I have seen a marked increase in the number of people with
episodes of disorientation & confusion, difficulty remembering things &
increased irritability which can be associated with exposure to natural
gas. Natural gas contains contaminants like PCBs and benzene which are
carcinogenics. They also contain toluene which may cause reproductive
problems. There is too little to gain and too much to lose.

IND188-1 Comment noted. See also the response to comment SA4-9.

IND188-2 See the response to comment FL2-2.

IND188-3 See the responses to comments SA4-9 and IND169-4. We also note that
prolonged exposure to the odorant should not occur as any detection is
intended to result in notification of the gas company for investigation and
repair.

IND189 – Edmund Haffmans

20140929-5032(29808330).txt

IND189-1 | Edmund Haffmans, Accord, NY.
The Proposed Alagonquin Incremental Market project (AIM) Pipeline should be rejected and denied for several reasons including but not limited to the following:

The proposed location for the pipeline presents a potential nightmare scenario for the mother of all disasters. Situated near the spent fuel rods of the Indian Point Nuclear Power Plant and major electrical transmission lines, an explosion, due to leakage or terrorist attack could be worse than disastrous.

IND189-2 | The pipeline would enable and encourage more hydrofracturing for "natural" gas. The fracking process is fraught with danger due to failed well casings, radioactive drill cuttings and radon gas. The extreme energy inputs and methane leakage make frack gas a greenhouse gas contributor equal to coal.

IND189-3 | Taxpayers and victims of any accidents should NOT be subsidizing a pipeline that is primarily designed to facilitate the export of gas via dangerous LNG terminals

IND189-4 | The money wasted on this insane project and the associate fracking might be better spent on energy conservation and renewable energy. A study by www.thesolutionsproject.org, and a similar study that was published in the November 2009 and April 2013 Scientific American shows how with existing technology we could transition to 100% renewable energy in a few decades, and save billions of dollars and thousands of lives in the process.

SAY NO TO AIM!

Page 1

IND189-1 See the responses to comments FA4-25, SA7-5, and CO7-6.

IND189-2 See the responses to comments FA4-24 and SA4-4.

IND189-3 See the responses to comments CO15-4 and IND102-3.

IND189-4 See the response to comment CO7-5.

IND190 – William Magaliff

20140929-5031 FERC PDF (Unofficial) 9/29/2014 12:06:33 AM	
<p>William N Magaliff, White Plains, NY. William N. Magaliff 88 Wayne Avenue White Plains, NY 10606</p> <p>September 28, 2014</p> <p>Ms. Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street NE, Room 1A Washington, DC 20426</p> <p>Dear Ms. Bose,</p>	
IND190-1	Please accept the following comments on the Draft Environmental Impact Statement ("DEIS") for the proposed Algonquin Incremental Market ("AIM") pipeline expansion project (the "Pipeline"), particularly as it affects Westchester, Rockland and Putnam counties in New York State. I urge the Federal Energy Regulatory Commission ("FERC") to withdraw the DEIS and take no further action on the application until all of the matters included in these comments and the comments received by other concerned parties are addressed in a revised DEIS.
IND190-2	The first and most important point I would like to make is that the DEIS is fatally flawed and should be withdrawn. There are many missing studies and evaluations, including the critical risk analysis of a NEW 42" pipeline segment crossing the Hudson River and entering Cortlandt, NY only 1500 ft. from the Indian Point Nuclear Energy Center with its 40 years of spent fuel rods, on two fault lines and intersecting with two proposed 1,000 megawatt power lines. Nuclear expert Paul Blanch has testified that the damage from a pipeline explosion in this area would cause greater damage than the Fukushima disaster.
IND190-3	I feel strongly that this pipeline expansion project should not be permitted because of hazards like radon exposure, explosions, methane leakage and highly toxic emissions from the compressor stations (with health impacts that include nosebleeds, headaches, dizziness, skin rashes, respiratory, developmental, neurological and cardiovascular problems, leukemia, breast, kidney and liver cancer).
IND190-4	In addition, we, as a nation, need to discontinue the unsafe and unsustainable exploitation of shale formations across the country through high-volume hydraulic fracturing which, despite its inherent danger and negative effects on health and global climate, is still moving full-steam ahead. It is clear that the U.S. has no systematic renewable energy program because fossil-fuel corporations have a hammer-lock on federal and local governments. This "business as usual" mode of operation needs to end as it is not in the best-interest of anyone on this planet!
IND190-5	We have no need for this expanded pipeline infrastructure as this region has access to plenty of gas already. It is clear that the interested parties are preparing for exportation of the Marcellus shale gas (proven

IND190-1 See the response to comment FA4-1.

IND190-2 See the responses to comments FA4-25, SA4-2, and SA7-4.

IND190-3 See the responses to comments SA4-4, SA4-9, and CO14-25.

IND190-4 See the responses to comments FA4-24, SA4-4, SA4-10, and FL2-2.

IND190-5 See the responses to comments FA4-24 and CO15-4.

IND190 – William Magaliff (cont'd)

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IND190-5 (cont'd)	by Spectra's plans to build LNG ports off Massachusetts and Canada's maritime provinces), which will trigger further unnecessary and harmful fracking in the Marcellus.
IND190-6	I concur with the members of SAPEIS and others (including scientists and medical professionals) who have studied the Spectra AIM project (as well as other fracking projects) that FERC's DEIS is "grossly incomplete and premature" and that "virtually no aspect of the DEIS is complete - with deficiencies that are pervasive and substantial." The DEIS omits crucial information needed to inform the public about the expansion, including a thorough analysis of the risks of constructing a 42" gas pipeline near a nuclear power plant. In addition, it is problematic (and unacceptable) that the surveys of endangered species are marked "confidential" by Spectra.
IND190-7	It is also unacceptable for Spectra to be allowed to submit the AIM pipeline project and its "Atlantic Bridge" (export terminal) project separately, since their cumulative impacts need to be reviewed. This separation of the two projects is called "segmentation," which has been judged illegal under federal law. FERC must require Spectra to have the AIM and Atlantic Bridge projects reviewed together rather than piecemeal.
IND190-8	I beseech you, as a commission of the federal government, and as fellow sentient beings, to carefully consider the negative (and lack of positive) impacts of this pipeline project. With adequate scientific study, it will undoubtedly be proven that the project will negatively impact the environment as well as the health of all life in the local area and that no mitigation efforts by Spectra Algonquin will be sufficient to prevent loss of life and property or degradation of health in the environs of this pipeline or compressor stations.
IND190-9	It is clear that this project is neither in the public convenience nor a necessity; therefore, I insist that the DEIS be withdrawn and that no further action be taken on the application until all of the matters included in these comments and the comments received by other concerned parties are addressed in a revised DEIS. Thank you. Sincerely, William N. Magaliff

- IND190-6 See the responses to comments FA4-1 and FA4-25. Also, certain agencies require that the results of threatened and endangered species surveys be marked confidential so as to not disclose the location of sensitive species.
- IND190-7 See the responses to comments FA3-5 and FA4-24.
- IND190-8 Comment noted.
- IND190-9 See the response to comment FA4-1.

IND191 – Jennifer Siskind

Kimberly D. Bose, Secretary
The FERC
888 First Street NE, Room 1A
Washington, D.C. 20426

US Army Corps of Engineers
New York District, CENAN-OP-R
Upstate Regulatory Field Office
1 Buffington Street, Bldg. 10, 3rd Floor
Watervliet, New York 12189-4000

- IND191-1 I urge you not to approve the Algonquin Incremental Market Project application.
- The DEIS that has been released for public comment is incomplete. There are dozens of missing required documents that I have been unable to review prior to the end of today's public commentary period. Allowing Algonquin Gas Transmission, LLC and Spectra Energy until the deadline date to submit materials requested by FERC staff (Section 5 lists 42 requests) does not give me the opportunity to examine these documents. This is in violation of the National Environmental Policy Act. FERC's conclusion that no significant environmental impacts will occur cannot be made on basis of fact due to the absence of these materials.
- IND191-2 The DEIS also fails to consider cumulative impacts of this project and segmentation of the Algonquin pipeline expansion. The 36A loop that will extend from the Cromwell Compressor Station is a pipe to nowhere in the AIM Project. However, Spectra's plans to further expand the Algonquin pipeline through the Atlantic Bridge Project have already been announced. This loop will be continued for 10 + miles, including HDD under the Connecticut River and through wetlands & other water body crossings in Glastonbury. The DEIS fails to address these future impacts.
- IND191-3 The DEIS also fails to take into account additional environmental and health impacts that will occur due to increased emissions. The application for an additional gas-fired compressor engine in Cromwell and upgrades to the Glastonbury Metering & Regulating Station along with the increased amount of gas needing to be processed at these locations will likely result in increased emissions and ground level ozone in non-attainment areas. A formal, independent Health Impact Assessment as outlined by the Centers for Disease Control needs to be completed. Independent, baseline levels of current emissions are also warranted before proceeding.
- IND191-4 The safety risks for installing a 42 inch pipe in close proximity of the Indian Point Nuclear Power Station have not adequately been addressed. A comprehensive, independent study that examines both blast and thermal impacts to the building that houses spent nuclear fuel rods needs to be conducted before permitting. Assuming "low" risk without adequate study is

IND191-1 See the response to comment FA4-1.

IND191-2 See the responses to comments FA3-5 and FA4-24.

IND191-3 See the responses to comments SA4-9 and SA4-10.

IND191-4 See the response to comment FA4-25.

IND191 – Jennifer Siskind (cont'd)

IND191-4
(cont'd) premature and inadequate. Both FERC and the NRC need to plan for fail-safe risk to the community before allowing this quantity of combustible gas to be transported this close to a nuclear facility. Title 10 to the Code of Federal Regulations requires this and should have been included in the DEIS.

IND191-5 At the very least, this draft EIS needs to be withdrawn and a supplemental EIS with additional public comment period issued. However, the problems concerning safety, public health and environmental risks and damages outweigh public interest or need that this project would serve. FERC should deny this application and not permit.

Jennifer Siskind, 101 Fairview Terrace, South Glastonbury, CT, 06073

IND191-5 See the responses to comments FA4-1, FA6-5, and SA1-12.

IND192 – Marty Walsh

20140929-5047 FERC PDF (Unofficial) 9/29/2014 7:29:11 AM

IND192-1 | marty walsh, peekskill, NY.
to whom it may concern, i am very much against the proposed algonquin
pipeline expansion. i was initially open minded to it, but after
extensive research and listening to the arguments both pro and con ive
come to the conclusion that it would be a huge mistake to go ahead with
the project. they are not only under insured, but it also hasnt been
shown to me that the project can be performed safely

IND192-1 See the responses to comments CO14-25 and LA1-10.

IND193 – Susan Van Dolsen

20140929-5049 FERC PDF (Unofficial) 9/29/2014 6:14:11 AM

Ms. Susan Van Dolsen
29 Highland Rd.
Rye, NY 10580

September 28, 2014

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

IND193-1

**RE: COMMENT TO THE FEDERAL ENERGY REGULATORY COMMISSION
RE: SPECTRA ENERGY'S ALGONQUIN INCREMENTAL MARKET PROJECT (AIM)
DOCKET# CP14-96-000**

Dear Secretary Bose,

Over 26,600 people have signed the SAPE (Stop the Algonquin Pipeline Expansion www.sape2016.org) petition, and 29 (twenty-nine) elected officials have signed a letter asking FERC to withdraw this flawed document due to serious omissions from the DEIS, including, but not limited to:

- Final conclusion on safety-related conflicts with the Indian Point Energy Center not provided (Section 4.12.3);
- Design modifications for New York M&R stations not complete (Section 4.11.1.2);
- Site Specific construction plan for St. Patrick Church not provided (Section 4.8.5.1);
- Site Specific construction plan for Buchanan-Verplanck Elementary School not provided (Section 4.8.5.1);
- Final plans for the Catskill Aqueduct crossing not developed (Section 4.3.2.1);
- Field Sampling Plan for potential soil contamination not provided (Section 4.2.2.6);
- Alternatives for the Hudson River crossing not prepared (Section 4.4.3);
- NY State Dept. of State approval of consistency assessment for Hudson Crossing (Section 4.8.4.1);
- Tree survey of Harriman State Park not complete (Section 4.6.1.5)

IND193-1

See the response to comment FA4-1.

IND193 – Susan Van Dolsen (cont'd)

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IND193-2	<p><u>I. STATEMENT ABOUT FERC PROCESS</u></p> <p>The very first page of the Draft EIS states, <i>"The FERC staff concludes that approval of the proposed project would result in some adverse environmental impacts; however, most of these impacts would be reduced to less-than-significant levels with the implementation of Algonquin's proposed mitigation and additional measures recommended in the draft EIS."</i> It is highly objectionable that FERC has reached a conclusion prior to completion of so many critical studies and assessments and prior to the issuance of a Final Environmental Impact Statement.</p> <p>The Commission issued the DEIS for public comment. Therefore, it is reasonable for the public to believe that the NEPA process includes an evaluation of impacts on American citizens and their quality of life. After reading this DEIS and researching other FERC decisions, it is clear that the process glosses over the many direct health, safety and quality of life issues of impacted citizens. Rarely, if ever, does FERC deny a Certificate of Public Convenience and Necessity, no matter how inconvenient and unnecessary the project might be. Federal preemption supersedes local zoning and the will of local communities is often subjugated. Although the public may submit comments and raise serious issues, but if the Commission judges the company's mitigation plans to be sufficient, the Certificate will be issued. I contend that this process is fundamentally skewed and undemocratic, as evidenced by FERC's premature conclusion on page 1 of the DEIS. The woefully inadequate preparation of the DEIS and the limited ability for public comment belies a predisposition to approving projects.</p> <p>The Draft Environmental Impact Statement is fundamentally flawed and should be withdrawn. A Supplemental Draft Environmental Impact Statement should be submitted for public review only after all relevant parties have submitted all necessary information. At that time, a new ninety (90) day public comment period should commence.</p>
IND193-3	<p><u>II. DISCUSSION OF MISLEADING INFORMATION ABOUT THE AIM PROJECT</u></p> <p>Before I address specific issues related to the DEIS, I feel it is very important for the Commission (FERC) to understand that Spectra/Algonquin representatives have made fundamentally misleading statements about the AIM project. In order to gain support for the project, Spectra/Algonquin representatives and agents have stated that this project entails replacement of existing 26" pipeline with 42" pipeline. Some Spectra/Algonquin representatives have stated that the pipeline is an "upgrade" that follows an existing right-of-way. Spectra/Algonquin representatives have supplied media outlets with maps showing replacement of pipeline without highlighting the NEW segment of 42" diameter high-pressure pipeline that will traverse the Hudson River and enter Verplanck, NY only 1,500 feet from the Indian Point Nuclear Facility and 450 feet from the Buchanan-Verplanck Elementary School.</p>
2	

IND193-2 See the responses to comments FA4-1, FA6-5, SA1-12, and IND173-8.

IND193-3 The EIS accurately reflects the facilities and construction methods for the proposed Project.

IND193 – Susan Van Dolsen (cont'd)

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IND193-3
(cont'd)

<http://www.lohud.com/story/news/local/2014/09/12/alconquin-pipeline-project-sparks-safety-concerns/15535427/> "The work will be done in the existing rights of way, except for a section of new pipeline in Massachusetts," (Spectra's Director of Stakeholder Outreach, Marylee) Hanley said. **"We are going to go right into that same ditch."** Ms. Hanley is untrue and she should not be propagating misinformation to the public.

A. NEW SEGMENT OF PIPELINE

IND193-4

The DEIS, Section 2.2.1.4, Collocation with Existing Rights of Way, page 61, states "About 10.4 miles (85 percent) of the 12.3-mile-long Stony Point to Yorktown Take-up and Relay segment would also be collocated with existing utility corridors... **The only exception to this would be a portion of the new permanent right-of-way proposed along the section of the 42-inch-diameter pipeline to be installed in the Town of Stony Point and the Town of Cortlandt. About 1.8 miles (62 percent) of this 2.9-mile new pipeline segment would not be adjacent to existing corridors.**

Families live, work play, worship, and send children to school adjacent to the section of **NEW 42" diameter high-pressure pipe** and their quality of life and the risks to their health, well-being and home values will be significantly impacted by this part of the project. Minimizing impacts on human beings is unacceptable. The DEIS itself states, "Algonquin's proposed construction work areas would be located within 50 feet of 337 residential structures (i.e. houses and apartment buildings) and 95 non-residential structures (commercial or industrial facilities, sheds, garages). To address impacts on residents, Algonquin developed Residential Construction Plans... **We have reviewed the Residential Construction Plans and do not find them acceptable.**" FERC states that Spectra/Algonquin must provide a revised Residential Construction Plans taking into account comments from affected landowners. Will all of the residents living within the High Consequence Area (HCA) have an opportunity to see this plan and have an opportunity to comment? When and how will their input be incorporated? This is yet another reason to withdraw the DEIS and issue a Supplemental DEIS for public comment.

IND193-5

III. CUMULATIVE IMPACTS – SPECTRA AIM, SPECTRA ATLANTIC BRIDGE, AND SPECTRA-NORTHEAST UTILITIES ACCESS PROJECT

After the issuance of the DEIS, in September 2014, Spectra announced a merger with Northeast Utilities, including plans to further expand the Algonquin pipeline at a cost of \$3 billion to transmit up to 1 billion additional cubic feet of gas per day to delivery points in New England. <http://www.bostonglobe.com/business/2014/09/15/nstar-and-spectra-announce-project-increase-new-england-natural-gas-supply/11lyTBQ2oiSKqwKx0iZVnM/story.html?event=event12>

IND193-4

Section 4.12.1 of the EIS discusses federal safety standards for natural gas pipelines and how these standards are applied in HCAs. Section 4.12.3 of the EIS discusses safety-related concerns and other specific measures that Algonquin has proposed or that we are recommending to further address public safety concerns. The revised residential plans are included in appendix H of the EIS. See also the response to comment FA4-1.

IND193-5

See the responses to comments FA3-5, FA4-24, FA4-25, LA23-16, and FL4-10.

IND193 – Susan Van Dolsen (cont'd)

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IND193-5
(cont'd)

This expansion will follow the almost \$1 billion AIM project's 342,000 dekatherms/day and a second Spectra expansion, the Atlantic Bridge, which is proposed to deliver 100,000-500,000 dekatherms/day to delivery points in New England.
<http://www.spectraenergy.com/Operations/New-Projects-and-Our-Process/New-Projects-in-US/Atlantic-Bridge/>

These three Spectra proposals, as well as a KinderMorgan pipeline proposal are all slated to deliver gas to New England. I find it odd that the AIM project was actually downsized from its original plan to deliver 465,000 dekatherms. Could the downsizing have been done to increase the chance of approval of the AIM project? Why did Spectra/Algonquin remove the 4 mile segment east of Stoney Street in Yorktown from the AIM project only to put that same 4 mile segment back in the Atlantic Bridge plan? Is it a coincidence that the public comment period for the AIM project ends on September 29, 2014, the exact same day that the landowner Open House for the Atlantic Bridge project is being held by Spectra/Algonquin in Yorktown, NY? How would you feel if you were a resident of Yorktown, NY?

Regarding the newly announced **THIRD** Spectra Algonquin expansion, the Access Northeast project, Spectra's marketing materials state, "Access Northeast will lessen environmental and community impacts by maximizing the use of existing pipeline corridors and natural gas infrastructure instead of significant greenfield developments in the region." Again, the company is purposely downplaying the impact on the hundreds of families living in the area near the **NEW 42" diameter segment of high-pressure gas pipeline**. This segment will cross the Hudson River and cause significant and possibly catastrophic risks to the surrounding region. The AIM project should not be evaluated in isolation; FERC should fully evaluate the future expansions that will add a much greater volume of gas to the volume transmitted through the proposed new 42" diameter high-pressure pipeline proposed to cross the Hudson River and enter Cortlandt, NY. What is the maximum volume that is safe to transmit through a pipeline that runs only 1500 feet from a nuclear power plant in a highly populated region, on two fault lines, with 40 years of spent fuel rods stored in the plant? This is a central question that has not been answered.

The public relations message used by Spectra/Algonquin is obviously a deliberate attempt to minimize the perception of risks and damages associated with the project. FERC should be required to follow the NEPA law, including an analysis of cumulative impacts on the entire region resulting from the AIM project and the subsequent Atlantic Bridge and Access projects. If the projects' impacts are segmented or deliberately under-estimated, that is not only a legal violation, but it is a bold attempt to manipulate public perception and opinion in order to gain approval for their projects.

IND193-6

The people living along the expanded pipeline route should not be sacrifices for the gas industry to profit by expanding its infrastructure to transmit the gas to New England and then to Canada through the Maritimes & Northeast pipeline and then overseas.

IND193-6

See the response to comment CO15-4.

IND193 – Susan Van Dolsen (cont'd)

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IV. SPECIFIC ISSUES RELATED TO DRAFT ENVIRONMENTAL IMPACT STATEMENT

A. ENTERGY RISK ANALYSIS (Section 4.12.3)

IND193-7

In Section 4.12.3, the DEIS states that "Algonquin has coordinated with Entergy to provide information about its proposed pipeline and Entergy is performing a Hazards Analysis." This analysis is incomplete, yet the DEIS states "For the small portion of the Project where looping or a new pipeline is proposed, based on these numbers, we conclude that the proposed AIM Project would represent a slight increase in risk to the nearby public." This conclusion is without scientific or engineering basis and should not be included by FERC in this DEIS.

Nuclear expert Paul Blanch, with 45 years of experience in the industry, states in a letter to the Westchester County Board of Legislators, "Consequences of this type of accident in Westchester County are incalculable and could well exceed the damages of the Fukushima accident. In my opinion, there is no way either Entergy or the NRC could approve this project as presently proposed but they will make every effort to find a way to justify this dangerous project."

As a Westchester resident for my whole life and having raised a family in this county, I cannot imagine how any elected official would consider supporting the installation of a new 42" gas pipeline at this location. Westchester, Putnam and Rockland Counties and several municipalities have passed resolutions calling for independent risk assessment of the AIM expansion near Indian Point. FERC should require this independent risk assessment to be done immediately and the results provided in a transparent manner for public comment. Fortunately, many of the state, county and municipal elected officials from both political parties stand with us on this critical request.

B. HORIZONTAL DIRECTIONAL DRILLING

IND193-8

The DEIS's discussion of the Hudson River crossing alternatives is incomplete, as stated in the DEIS Section 4.3.2.1. Therefore, it is impossible to evaluate the environmental impacts on the Hudson River without the critical missing information about contingency plans should the proposed Horizontal Directional Drilling (HDD) method fail. "To date, Algonquin has not provided a contingency plan that incorporates another location or another construction methodology for each of the HDD crossings. Therefore, if the HDD in its proposed location proves unsuccessful, Algonquin will be required to identify a new location for the crossing or a new methodology, and request approval for the new location or methodology with all applicable agencies."

When asked about this at public presentations, Spectra/Algoquin representatives stated that they were confident that the HDD would succeed because the technique was

IND193-7

See the response to comment FA4-25.

IND193-8

See the response to comment SA11-6. Similar geologic conditions exist at the proposed HDD crossing as existed at the New Jersey-New York Hudson River crossing. If the HDD were to fail Algonquin, would work with appropriate agencies as part of their permit application to request a new HDD crossing location or propose a new crossing technique. Section 4.3.2.3 of the EIS has been revised to include a recommendation that Algonquin file a site-specific plan in the event of an unsuccessful HDD. The permitting process would be subject to public review.

IND193 – Susan Van Dolsen (cont'd)

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IND193-8
(cont'd)

employed by Spectra in the Hudson River Crossing for the New Jersey-New York expansion project. Is there a geological or scientific basis for this confident response? If the company would have to reapply to the agencies upon failure of the HDD, would there be a full Environmental Impact Statement of all alternatives, including the opportunity for public comment? Because this is not explained in the DEIS, it is possible that the project could move forward to accommodate the company's timetable and the need to expedite construction. This does not serve the public interest and violates the spirit of the NEPA process.

IND193-9

Concerns about the HDD river crossing are very pertinent because of a precedent regarding a Hudson River crossing, which was set in the case, *Millennium Pipeline v. Gutierrez*, decided on March 31, 2006.
http://www.leagle.com/decision/2006592424FSupp2d168_1578.xml/MILLENNIUM%20PIPELINE%20CO.,%20L.P.%20v.%20GUTIERREZ
The Millennium pipeline's FERC certificate was overturned due to the Court's ruling that it violated the Coastal Zone Management Act.

Section 4.8.4 of the DEIS states, "The NYDOS, through the Division of Coastal Resources (DCR), is the lead agency responsible for administering the State's Waterfront Revitalization and Coastal Resources Act, Section 919, as approved by NOAA in 1982. This act provides the NYSDOS with the authority to establish a coastal management program, develop coastal policies, define the coastal boundaries, and establish state consistency requirements." (p.4-149-150) "The Stony Point to Yorktown Take-up and Relay segment crosses the Coastal Zone Management area associated with the Hudson River in the Town of Stony Point and in the City of Peekskill." "In its application, Algonquin described how the AIM project would be consistent with each of the applicable state coastal policies, as well as with the applicable policies of the Stony Point and Peekskill LWRPs. However, concurrence from the NYSCOS has not yet been received." (P.4-150).

If the AIM pipeline expansion's HDD fails as it crosses the Hudson River, it is possible that the company would have to revert to the open trench method which was clearly a violation of the Coastal Zone Management Act in the precedent-setting Millennium pipeline case. If the HDD fails, Spectra/Algonquin may also have to change the location of the crossing. The Hudson River Critical Environmental Area (CEA) could be impacted if the crossing is moved to that area. Section 4.8.5.1 states that "The Stony Point to Yorktown Take-up and Relay segment in Westchester County would cross the Hudson River using the HDD to avoid impacts on the CEA." (p.4-158) What if the crossing is moved and there is no choice but to locate it within the CEA? Will there be a full Environmental Impact Statement with public comment at that point? Due to these very serious issues related to the Hudson River crossing, the precedent-setting Millennium case and the fact that there is no contingency plan, it is absolutely essential that FERC

IND193-9

See the response to comment SA1-6.

IND193 – Susan Van Dolsen (cont'd)

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IND193-10	require a full Environmental Impact Statement and public comment period for any revised plans that are submitted by Spectra/Algonquin should the HDD Hudson River crossing fail.
C. DEFICIENCIES IN SECTION 3, ALTERNATIVES	
IND193-11	<p>1) NO ACTION ALTERNATIVE</p> <p>NEPA requires the Commission to evaluate alternatives to the project, one of which is the No Action Alternative. Within this context, FERC is required to review alternative energy sources that could supply local distribution companies in New England with the energy supplied by the AIM pipeline as outlined in the company's application. FERC's analysis of alternatives is entirely inadequate and does not address the urgent need to address climate change. Only six pages out of over 1,000 pages in the DEIS provide a cursory analysis of energy conservation and renewable energy sources including wind, hydroelectric, biomass, solar/photovoltaic and tidal and wave. The Commission's conclusion is that the AIM project is the only way to provide the energy needed for the delivery areas. FERC's predisposition to promote fossil fuel projects creates an uneven playing field, which means that the No Action Alternative is unlikely ever to be chosen. FERC should be weighing the costs of this fossil fuel project to transmit 342,000 dekatherms of methane by truly examining its impacts on the climate and the resulting consequences for human health and the economy.</p> <p>Should FERC grant a Certificate of Public Convenience and Necessity for the Spectra/Algonquin AIM project, it would be committing almost \$1 billion to yet another fossil fuel project that incentivizes more dependence on fossil fuels and undermines the development of renewable energy projects. Should the subsequent Spectra Atlantic Bridge and Access projects be approved, the expenditure would likely top \$5 billion. A study published in the scientific journal, <i>Environmental Research Letters</i>, on September 24, 2014 examined the effect of increased use of natural gas and concludes, "Our results suggest that without strong limits on GHG emissions or policies that explicitly encourage renewable electricity, abundant natural gas may actually slow the process of decarbonization, primarily by delaying deployment of renewable energy technologies." http://iopscience.iop.org/1748-9326/9/9/094008/article.</p>
IND193-12	<p>2) CLIMATE CHANGE</p> <p>There is an obvious contradiction in the DEIS' discussion of Climate Change (Section 4.13.18). The DEIS cites the Intergovernmental Panel on Climate Change (IPCC) as the "leading international, multi-governmental scientific body for the assessment of</p>
7	

IND193-10 See the responses to comments FA4-1 and FA6-5.

IND193-11 See the responses to comments CO7-5, FL2-2, and FL4-11.

IND193-12 See the responses to comments CO12-13 and CO14-55 for additional information regarding GHG impact assessments prepared for the Project.

IND193 – Susan Van Dolsen (cont'd)

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IND193-12
(cont'd)

climate change." It further states, "The leading U.S. scientific body on climate change is the U.S. Global Change Research Program (USGCRP)."

The DEIS states (p.4-284)

"The IPCC and USGCRP have recognized that:

- globally, GHG's have been accumulating in the atmosphere since the beginning of the industrial era (circa 1750);
- combustion of fossil fuels (coal, petroleum and natural gas, combined with agriculture and clearing of forests, is primarily responsible for this accumulation of GHG;
- those anthropogenic GHG emissions are the primary contributing factor to climate change;
- impacts extend beyond atmospheric climate change alone, and include changes to water resources, transportation, agriculture, ecosystems and human health."

Page 4-285 of the DEIS goes on to list the dire consequences of climate change on the Northeast as documented in the USGCRP report, including, but not limited to:

- "average temperatures have risen about 2 degrees F between 1895 and 2011 and are projected to increase another 1 to 8 degrees F over the next several decades with more frequent days over 90 degrees F;
- areas that currently experience ozone pollution problems are projected to experience an increase in the number of days that fail to meet federal air quality standards;
- an increase in health risks and costs for vulnerable populations due to projected heat and stress and poor air quality;
- sea levels have risen about 1 foot since 1900 and are projected to continue increasing 1 to 4 feet by 2100 stressing infrastructure (communications, energy, transportation, water and wastewater);
- severe flooding due to sea-level rise and heavy downpours are likely to occur more frequently;

IND193 – Susan Van Dolsen (cont'd)

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IND193-12 (cont'd)	<ul style="list-style-type: none"> crop damage from intense precipitation events, delays in crop plantings and harvest, and heat stress negatively affect crop yields; an increase in carrier habitat and human exposure to vector-borne diseases (e.g., Lyme disease or West Nile)." <p>Despite all of this evidence and FERC's acknowledgment of the impact of fossil fuels on climate change and associated health and economic consequences, the DEIS contends, "<i>GHG emissions from the proposed Project would not have any direct impacts on the environment in the Project area.</i>" This conclusion is illogical and subjective.</p>
IND193-13	<p>a) IMPACT OF METHANE ON CLIMATE CHANGE</p> <p>Moreover, FERC's statement is ironic because the Intergovernmental Panel on Climate Change (IPCC), cited by FERC as the "leading international, multi-governmental scientific body for the assessment of climate change," published a draft report in 2013 (final report due out in Nov. 2014) stating that methane is 86 times more potent as a green house gas over 20 years and 34 times more potent over 20 years than CO₂. http://www.climatechange2013.org/images/uploads/WGIAR5_WGI-12Doc2b_FinalDraft_All.pdf. Looking at the potency over 20 years is more appropriate because the effects of climate change are rapidly advancing. The EPA is still using an old formula, cited in the DEIS, calculating methane as 21 times more potent than CO₂, which does not reflect the most up-to-date science: http://epa.gov/climatechange/ghgemissions/gases/ch4.html.</p> <p>The impact of methane on climate change is exacerbated by the fugitive emissions that occur from the full lifecycle of gas development. Dr. Anthony Ingraffea of Cornell studied fugitive methane emissions from gas drilling and published the study in the scientific journal, <i>Climatic Change</i>, in 2011: http://www.eeb.cornell.edu/howarth/Howarth%20et%20al%20%202011.pdf. "Natural gas is composed largely of methane, and 3.6% to 7.9% of the methane from shale-gas production escapes to the atmosphere in venting and leaks over the life-time of a well. These methane emissions are at least 30% more than and perhaps more than twice as great as those from conventional gas. The higher emissions from shale gas occur at the time wells are hydraulically fractured—as methane escapes from flow-back return fluids—and during drill out following the fracturing."</p> <p>Other studies have documented high levels of fugitive methane emissions, including one conducted by NOAA and the University of Colorado published in the scientific journal <i>Geophysical Letters</i>, on August 27, 2013: http://onlinelibrary.wiley.com/doi/10.1002/grl.50811/abstract.</p>
9	

IND193-13

See the responses to comments FA4-23, FA4-24, CO12-3, CO19-8, and CO32-3.

IND193 – Susan Van Dolsen (cont'd)

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IND193-13
(cont'd)

This study found fugitive methane emissions from 6-12% in gas fields in the Uinta Basin in Utah.

Additionally, leaks from existing pipelines and gas infrastructure are contributing to climate change each and every day. FERC's approval of the multitude of gas infrastructure projects is incentivizing shale gas development with its associated high methane emissions. Thus, the net effect of a larger buildout of pipeline infrastructure is that it promotes more fossil fuel development with its negative environmental, economic and health consequences.

The Conservation Law Foundation stated in its scoping comments to FERC on 10/28/13 in Docket PF13-16 (20131028-5156(28874681):

"A detailed assessment of greenhouse gas emissions impacts is required under the National Environmental Policy Act ("NEPA") because greenhouse gas emissions from the production and transmission of natural gas are significant, electricity generation is among the most significant sources of greenhouse gas emissions, and the Project has critically important implications for electric systems in New England... By statutes, Executive Orders, and agency policies, the Federal government is committed to the goals of energy conservation, reducing energy use, eliminating or reducing GHG emissions, and promoting the deployment of renewable energy technologies that are cleaner and more efficient. Where a proposal for Federal agency action implicates these goals, information on GHG emissions (qualitative or quantitative) that is useful and relevant to the decision should be used when deciding among alternatives."); *see also Center for Biological Diversity v. NHTSA*, 538 F.3d 1172, 1217 (9th Cir. 2008) ("The impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct."). In order to comply with the requirements of NEPA, FERC's Project EIS must include a detailed consideration of the greenhouse gas implications of the Project."

Despite this clear call to action, the DEIS does not analyze the GHG emissions in depth or reflect current scientific studies. FERC must comply with NEPA by including this critical information about methane's contribution to greenhouse gas emissions when making its assessment of Alternatives.

D. EXAMINING NEED FOR GAS IN NEW ENGLAND

IND193-14

1) GAS DEVELOPMENT RUNS COUNTER TO GREENHOUSE GAS INITIATIVES

FERC concludes that the AIM project is the only way to deliver the quantity of natural gas to the delivery areas. This is predicated on the need for 342,000 dekatherms/day to supply ten Shippers and eight Local Distribution Companies and two municipal utilities in CT, RI and MA. The Spectra/Algonquin application justifies the project because the Governors of the New England states signed an agreement in July 2013 that would

IND193-14

Regardless of the support or opposition to the 2013 New England Governor's Agreement, section 1.1 of the EIS identifies the purpose of the Project is to deliver 100 percent of the gas to the local distribution companies and municipalities who have signed precedent agreements for the gas. We also note that each of the shipper's precedent agreement has been approved or considered in a hearing by the applicable shipper's state regulatory authority.

IND193 – Susan Van Dolsen (cont'd)

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IND193-14 (cont'd)	<p>encourage more natural gas to be delivered to New England for home heating and electric generation purposes. Since 2013, many groups and individuals have spoken out in opposition to the New England Governors' agreement because fossil fuel development, including gas pipeline projects, contradicts the states' greenhouse gas initiatives and undermines investment in renewable energy. In July 2014, three members of an environmental advisory committee for Governor Deval Patrick of Massachusetts "resigned in protest of policies they say hinder the state's goal of significantly cutting the greenhouse gases that cause climate change by the end of the decade."</p> <p>http://www.bostonglobe.com/metro/2014/07/29/environmental-advisers-patrick-administration-resign/vWio5x2NELLSxhMSn3SbwN/story.html</p> <p>"Peter Shattuck, an Environment Northeast official who also resigned from the committee, said he was concerned about the administration's 'inadequate evaluation' of alternative energy projects. 'We could be committing billions of public dollars to pipelines that will increase our reliance on fossil fuels, and shift investment risk from private companies onto electric ratepayers,' he said. Before making such a commitment, Shattuck said, 'we need a transparent public discussion about utilizing all available options to meet our energy needs.'"</p> <p>2) SPOT MARKET PURCHASING V. FIRM CONTRACTS</p>
IND193-15	<p>In addition, there are serious questions about inflated statements of need by energy providers. Because utilities are not required to sign firm contracts, they purchase gas on the spot market. When there is a cold snap, as there was last winter, the price of gas on the spot market was often very high. Ratepayers were charged for the higher cost and the gas companies blamed price spikes on lack of infrastructure to transmit the gas. One of the first reforms that should be instituted is to require utilities to sign firm contracts. Need for more infrastructure should be evaluated after utilities commit to purchase energy by signing firm contracts.</p> <p>3) MARKET MANIPULATION</p>
IND193-16	<p>Another issue regarding energy distribution is market manipulation by Wall Street banks and other investors that profit from auctioning off congestion contracts. The congestion contracts were designed to help utilities hedge against price spikes. However, investors make profits by trading the congestion contracts, and the ratepayer ends up paying for the rate hikes.</p> <p>The New York Times article, "Traders Profit as Power Grid is Overworked," describes how the market can be manipulated:</p> <p>http://www.nytimes.com/2014/08/15/business/energy-environment/traders-profit-as-power-grid-is-overworked.html?_r=0</p>

IND193-15

Regulatory requirements for utility companies vis a vis contracting for transportation services are determined by the state public utilities commission or similar regulatory authority at the state level, not by the FERC. As indicated in section 1.1 of the EIS, Algonquin has executed precedent agreements with 10 shippers, including 8 local distribution companies and two municipal utilities, for firm transportation service to deliver new natural gas supplies to the Northeast region.

IND193-16

Your comment about alleged market manipulation of electricity associated with constraints on the Northeast's power grid are noted but beyond the scope of the EIS, which addresses the environmental impact of a natural gas project.

IND193 – Susan Van Dolsen (cont'd)

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IND193-16
(cont'd) Though FERC has begun investigating these manipulative practices, the article states, "The commission has been trying to crack down in the electricity market lately, but for years it has been outmaneuvered by traders it is supposed to police." The public should not be a pawn in corporate profit-making schemes and the energy markets must be realigned to reflect proper pricing systems that do not cause municipalities and ratepayers to bear undue costs.

4) NESCOE (NEW ENGLAND STATES COMMITTEE ON ELECTRICITY):

IND193-17 A non-profit group in New England, NESCOE, commissioned a study by Black and Veatch in 2013 to quantify the true need for energy in New England. http://www.nescoe.com/uploads/Phase_III_Gas-Elec_Report_Sept_2013.pdf Three scenarios were presented in the study and the conclusion was that in the low-demand scenario, no new infrastructure was needed. However, all three scenarios assume the AIM project expansion will be approved by FERC. This assumption should not be made for the reasons stated above. Governor Deval Patrick, after meeting with constituents, agreed that the Black & Veatch study was conducted with industry bias and he agreed that it must be redone. Thus, FERC must wait until the revised NESCOE study is completed in order to fully assess the true need for natural gas in New England. NESCOE has a panel of advisors who will be working on revising the study.

E. RENEWABLE ENERGY

IND193-18 When evaluating Alternatives, the DEIS acknowledges that Federal and State programs "have contributed to or encouraged energy conservation and efficiency in the Project area." (p.3-3) Furthermore, the DEIS states, that "renewable energy sources are another long-term fuel source alternative to natural gas, including wind, hydropower, biomass, solar, and tidal and wind energy. The DOE's Energy Information Administration (DOE/EIA) (2013) projects rapid growth in renewable fuel consumption due primarily to the implementation of a federal fuels standard for transportation fuels and state renewable energy portfolio standards programs for electricity generation." (p.3-4).

Earlier in these comments, studies were cited about methane's potency as a greenhouse gas and its contribution to climate change. It's clear that natural gas is not a "bridge fuel" and its use should be dis-incentivized. Therefore, rather than a cursory review of Alternatives in Section 3.0, the DEIS should include an in-depth analysis of the initiatives that are occurring in real time with regard to conservation, efficiency and development of renewable energy.

The DEIS acknowledges that New York LDC's have not made a commitment to purchase the gas in the AIM pipeline expansion and that the gas is for New England customers, yet New York will bear the brunt of many of the project's risks. The New

IND193-17 We disagree. As indicates in section 1.1 of the EIS, Algonquin has executed precedent agreements for firm transportation service to 10 shippers. The AIM Project is a result of those requests for transportation service.

IND193-18 Comment noted. See the responses to comments CO7-5 and FL2-2.

IND193 – Susan Van Dolsen (cont'd)

20140929-5049 FERC PDF (UNOFFICIAL) 9/29/2014 6:14:11 AM

IND193-18
(cont'd)

York State Governor's Energy Plan was submitted for review by the New York Public Service Commission and was open for public comment earlier this year. Unfortunately, despite a goal to reduce greenhouse gases 80% by 2050, the plan does not provide a roadmap to this goal. However, Dr. Mark Jacobson of Stanford, et al published peer-reviewed study in 2013 in the Journal, *Energy Policy*, that demonstrates that New York and the entire country could be powered 100% by renewable energy by 2050: <http://web.stanford.edu/group/efmh/jacobson/Articles/I/JDEnPolicyPt1.pdf>.

New Yorkers are acutely aware of climate change. Superstorm Sandy hit the region hard in 2012 and it doesn't make sense to continue incentivizing fossil fuel infrastructure. New York energy policy is gradually shifting. The NY Sun Initiative was approved, and the NY PSC is leading an effort known as the REV (Reforming the Energy Vision) to restructure the utility business. Other initiatives are moving forward in New York, including community solar projects and wind farms. More and more people are installing solar photovoltaic, including my family, due to favorable leasing programs. PACE financing and other programs make access possible for businesses and municipal buildings, and incentives are being shifted so that more businesses and homes can tap into renewable energy sources.

An article in the New York Times on September 24 entitled, "Taking the Baton on Climate Change: As Governments Lag, Some Companies Step Up," highlights major corporate commitments to solar and wind energy, <http://www.nytimes.com/2014/09/24/business/energy-environment/passing-the-baton-in-climate-change-efforts.html?module=Search&mabReward=relbias%3Aw%2C%7B%22%22%3A%22R%3A8%22%7D&r=0>

Apple's Chief Executive Timothy D. Cook spoke at the United Nations Climate Summit. "Mr. Cook in his most forceful statements yet about the environment, rejected the idea that society must choose between economic growth and environmental protection. He pointed to the huge solar farm his company has built in North Carolina to help power a data center there."

In other regions of the country and abroad, solar power was actually cheaper than building new fossil fuel or nuclear plants. Georgia, Idaho, Utah, Minnesota, Texas, California and Colorado all found this to be true during the past year, as noted by the non-profit, Vote Solar. The Minnesota case is most notable because it poses the questions that FERC should be considering about the direction of energy policy in the United States: http://www.huffingtonpost.com/lewis-milford/natural-gas-loses-to-sola_b_4556162.html

"On the last day of 2013, an administrative law judge for the Minnesota Public Utilities Commission, Eric Lipman, issued a decision about competing energy investments for Minnesota's future. The state utility Xcel offered up several proposals to fill a 100 megawatt

IND193 – Susan Van Dolsen (cont'd)

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IND193-18
(cont'd)

power need. The two main competitors were a new fossil fuel plant powered by natural gas and a series of many distributed solar projects to be built around the state, the so-called Geronimo \$250 million solar proposal.

This decision wrestled with competing visions of the U.S. energy future. Will it be dominated by new, large fossil fuel plants powered not by coal but by natural gas, as gas continues to replace coal - even though gas still emits significant greenhouse gas emissions? Many of the energy pundits say that is where we are heading. They argue that gas will be the cheapest fuel, beating out more expensive solar, so let's just ignore the climate impacts of gas. That's the conventional wisdom.

But as with most conventional wisdom, it rests on a pile of unexamined assumptions. When this independent judge looked at the facts, rather than the hype, he found that solar wins and gas loses. He gave several reasons why solar is the preferred choice when all potential costs are considered.

First, he said that future electricity demand is uncertain, at least in the next five years. In that, he echoes what we are seeing around the utility industry. Power demand is flat or declining. There are many reasons for the fall, but they suggest trouble for the electricity sector. Will electric utilities be able to survive as power demand drops? And most important, what kind of power plants will they invest in, to replace the smaller amounts of power they need - big ones or smaller, distributed ones?

Second, he turned to the current and future carbon regulations that might apply to new fossil plants, including those using natural gas. Minnesota's existing law says fossil plants should not be built unless all renewable power is exploited first. The state's law also says the utility can obtain credits for solar purchases from new solar plants. He then examined how future carbon regulations could add to the price of power from a natural gas plant that would last for fifty years, as compared to a solar plant that has zero fuel costs.

Third, he asked whether it was better to install smaller solar projects to avoid new transmission and distributed lines to serve electric customers. Those avoided lines would save the state over \$33 million as compared to a new natural gas plant that would not avoid those costs.

And then last, he asked the most important question, one that might foretell the future of energy policy in the competition of gas and renewable power. And that question was about scale - with the uncertain future of electric load, with the potential for added carbon costs and the real carbon emissions from natural gas, with the costs of new power lines for large plants, would it make more sense to approve funding for a large, central power plant powered by fossil fuel, or to make incremental, scalable investments in solar?"

Exciting new storage technologies are being discovered each day that will make solar energy even more practical. " An Israeli solar power company, Brenmiller Energy, says it has developed a new, more efficient way to store heat from the sun that could give a boost to the thermal solar power industry by enabling plants to run at full capacity night and day. By next year company founder Avi Brenmiller said he will have a 1.5 megawatt

IND193 – Susan Van Dolsen (cont'd)

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IND193-18
(cont'd)

(MW), 15-acre (6-hectare) site in the Negev desert connected to Israel's national grid, and a number of 10 to 20-MW pilots abroad are expected to follow, which will produce electricity at a price which competes with power from fossil-fuelled plants." <http://mobile.reuters.com/article/idUSKCN0HH1H120140922?irpc=932>.

IND193-19

CONCLUSION

The DEIS for the AIM project is incomplete and must be withdrawn and a revised DEIS must be submitted for public comment. There are many missing studies, reports and surveys that should be completed and available for public comment. Furthermore, FERC did not do a full evaluation of Alternatives reflecting current science.

Each day that goes by, the future of our planet and our existence is in greater peril. It's hard to imagine that, knowing all of the warnings about climate change and the need to move away from fossil fuels immediately, that the AIM project would be granted a certificate of Public Convenience and Necessity in the area that has been so hard hit by Superstorm Sandy just two years ago. Clearly, the FERC process is on the wrong track, with an almost 100% approval and rubber-stamping of all fossil fuel projects. The world is changing quickly and it's time for FERC to take a hard look at the impacts of its decisions. Should FERC choose to fully evaluate this project with all its externalities, it would deny the certificate of public convenience and necessary. This project is neither convenient nor necessary to the public.

IND193-19 See the responses to comments FA4-1, FA6-5, and SA1-12.

IND194 – David Brunetti

20140929-5050 FERC PDF (Unofficial) 9/27/2014 8:12:14 PM

September 27, 2014

eComment to the Federal Energy Regulatory Commission (FERC) on the Ocean State Power – Natural Gas Pipeline (Algonquin Incremental Market (AIM) Project) Comments

In regard to the Algonquin Incremental Market (AIM) Project, FERC docket CP14-96-000 / PF13-16-000, I strongly oppose the project for the following reasons:

IND194-1

1. Fracking

The primary reason for my opposition to this project is that this pipeline will carry gas from the Marcellus Shale and other sites using the drilling technique known as hydraulic fracturing ("fracking"). The Project is designed to provide gas produced from the Marcellus Shale to New England markets. At a time when there is mounting evidence of the dangers inherent to fracking for natural gas, and given that the long-term productivities of Marcellus Shale gas wells are unknown, it is unwise to approve a proposal that will encourage such a practice in fragile ecosystems and populated areas.

In thousands of homes across Pennsylvania, Ohio, and Texas, a lit match held to a running sink will cause the tap water to ignite. These columns of fire are the result of excess methane in the water supply. Methane is one of the many contaminants from fracking that leak into groundwater. Flammable water is just one of the many problems associated with the incredibly harmful practice of fracking.

In the process of fracking, large holes are drilled thousands of feet into the ground or horizontally out from old wells. Then a mixture of million of gallons of water, thousands of gallons of chemicals, and sand are pumped into the well at high pressure. This process cracks shale rocks and exposes reserves of natural gas. There are many risks and problems associated with this process.

The chemicals used in fracking, like mercury, lead, and formaldehyde, can leak into the water supply, causing a variety of health problems. Out of the 2,500 hydraulic fracturing additives, more than 650 contained known or possible human carcinogens regulated under the Safe Drinking Water Act. However, there is no such regulation for the usage of these chemicals in this industry. People who drink tap water near hydraulic fracturing sites can experience sensory and neurological damage, and if they are pregnant their children can experience birth defects. As previously mentioned, the tap water can become flammable. In one case, this flammable water caused a house to explode, killing a couple and their seventeen-month-old grandson. This water is also harmful to plants. In 2010, thousands of gallons of fracking waste-water were spilled on a California farm, killing \$1.7 million worth of produce.

Fracking has been linked with increased risk of earthquakes. There have been earthquakes near fracking sites in Arizona, Texas and Pennsylvania, states that don't even have fault lines.

The amount of water used in every fracking job is astronomical. Hydraulic fracturing uses between 1.2 and 3.5 million US gallons (4,500 and 13,200 m³) of water per well, with large projects using up to 5 million US gallons (19,000 m³). Additional water is used when wells are refractured. An average well requires 3 to 8 million US gallons (11,000 to

IND194-1

See the response to comment FA4-24.

IND194 – David Brunetti (cont'd)

20140929-5050 FERC PDF (Unofficial) 9/27/2014 8:12:14 PM

IND194-1
(cont'd)

30,000 m³) of water over its lifetime. Use of water for hydraulic fracturing can divert water from stream flow, water supplies for municipalities and industries such as power generation, as well as recreation and aquatic life. It converts water into wastewater, taking this water out of the water cycle and the possibility of further use. The large volumes of water required for most common hydraulic fracturing methods have raised concerns for arid regions, including in Pennsylvania and in drought-prone Texas, and Colorado. It may also require water overland piping from distant sources

This is an exceptionally wasteful process with regard to water usage and pollution of such water which subsequently makes it completely unusable.

Fracking puts a lot of stress on the environment. It requires deforestation, which disturbs habitats. It can cause air pollution. It contaminates water and soil. When waste water evaporates, it can contribute to acid rain. Fracking water also poisons animals, which are especially attracted to drinking this dangerous liquid.

Some hail fracking as the key to saving our economy. Much like the cigarette industry in the 1960s, the fracking industry is trying desperately to cover up all the harm that it causes. In 2010, the fracking industry spent \$145 million on lobbyists. Though they claim that fracking will bring jobs, this claim must be balanced with all the harm and negative impacts that are being left out of the equation.

Yes, fracking will create jobs in that sector, but it will be incredibly harmful to the agriculture industry and people in general that will be forced to pay for and deal with the health repercussions of contaminated water.

Overall, fracking is not worth any possible short-term benefits. This method is dangerous to both public health and the environment. It should be banned, period. However, in recent years the battle between big business and the interests of the general population has been won more often by big business. Let's hope our legislators prioritize our health and our Earth over a quick buck this time.

The essentially unregulated fracking industry is highly destructive and widespread, completely compromising/destroying land, water, and livelihoods for people and wildlife. Until the fracking industry is forced to comply with the Clean Water Act, the Safe Drinking Water Act, the Clean Air Act, the Endangered Species Act, and other regulations that protect our air, water, agriculture, our health, our wildlife, and our environment in general, you must not be approving projects that will only result in the expansion of this non-regulated, highly destructive industry.

FERC must examine in its review of the proposed pipeline all secondary and cumulative impacts the Project will have, including encouraging the expansion of fracking in the region.

IND194-2

2. Project necessity and overall impact

I am concerned that as domestic natural gas demand and prices remain low, the expanded capacity requested under this Project will be used to supply gas from the Marcellus Shale to proposed export facilities. The communities impacted by this proposed pipeline infrastructure will not see environmental or economic benefits as a result of the Project.

IND194-2

See the response to comment CO15-4.

IND194 – David Brunetti (cont'd)

20140929-5050 FERC PDF (Unofficial) 9/27/2014 8:12:14 PM

IND194-2
(cont'd)

Algonquin's application states that the Project is being proposed to deliver gas to markets in New England; however, the proposed Project is both a product of development in the Marcellus Shale and a likely catalyst for further gas development by providing an avenue to export that gas to the international market. The Algonquin natural gas transmission system connects with Texas Eastern's facilities in New Jersey and extends approximately 250 miles through New Jersey, New York, Connecticut, Rhode Island and Massachusetts where it connects to Maritimes & Northeast ("M&N") Pipeline. According to Spectra Energy Partners LP's 10K report filed with the US Securities and Exchange Commission, "M&N US is connected to the Canadian portion of the Maritimes & Northeast Pipeline Limited Partnership, which is owned 78% by Spectra Energy." The AIM expansion project suggests that the gas may be exported to Canada and overseas.

The Project has the potential to make gas available for transport to LNG export facilities on the East Coast and in Canada. Three LNG facilities: the Northeast Gateway Deepwater Port and the Neptune Deepwater Port, both off of Gloucester, Massachusetts, and the Distrigas terminal in Boston Harbor are idle for lack of LNG import activity; these facilities could potentially be converted to export facilities.

The "Canaport" LNG facility in New Brunswick, Canada has been given permission to export gas via tanker as of November, 2013. Pieridae Energy Canada is looking to site an LNG export facility in Nova Scotia.

Exporting Gas Hurts National Economy, Not in Public Interest . The Energy Information Administration ("EIA") predicts the US will be a net exporter of Liquefied Natural Gas ("LNG") by 2016. The U.S. Department of Energy ("DOE") is currently reviewing applications for LNG export authorization. If all were approved this would lead to an export capacity of over 28 billion cubic feet ("Bcf") per day, approximately 42 percent of what the U.S. produced daily in 2013.⁷ The EIA predicts that an average of 63 percent of exported LNG will come from new gas drilling, but this could rise to 71 percent by 2035.

An EIA study found considerable impacts from LNG exports, and researchers at Purdue University and other institutions have confirmed the EIA findings. Impacts that do not make this Project in the public convenience and necessity include:

- slightly depressed Gross Domestic Product ("GDP"): "Using the natural gas in the U.S. is more advantageous than exports, both economically and environmentally,"
- increased domestic price of natural gas—as much as 47%,
- higher electricity rates— as much as 7.2%
- increase in greenhouse gas emissions by as much as 12%,
- decreases in the manufacturing sector as much as 3.1%,
- fracking boom in shale formations,
- major U.S. wealth transfer from consumers and energy-dependent industries to the natural gas industry and its investors.

IND194-3

3. Methane Leakage and Impact on Climate Change

The concern is that of fugitive methane emissions from the pipeline, compressor stations, and metering and regulating stations. There are documented problems with valves that Spectra energy uses in gas infrastructure projects.

IND194-3

See the response to comment FA4-23 for additional information regarding Algonquin's methane emission minimization efforts. See the response to comment CO7-3 for additional information regarding methane global warming potential. See the responses to comments CO12-13 and CO14-55 for additional information regarding GHG impact assessments prepared for the Project.

IND194 – David Brunetti (cont'd)

20140929-5050 FERC PDF (Unofficial) 9/27/2014 8:12:14 PM

IND194-3
(cont'd)

The Pipeline Hazardous Materials Safety Administration (PHMSA) issued Spectra Energy CEO Greg Ebel a 'final order' and civil penalty of \$134,500 related to various violations across several states. Issued in this order, the company was cited for failure regarding valve inspection. "Trillium Asset Management, with over \$1 billion in assets under management, has filed a shareholder resolution requesting a report from Spectra Energy's Board of Directors on its fugitive methane emissions.

Methane emissions from shale gas infrastructure projects are recognized as a significant contributor to climate change. Methane is 86 times more powerful than CO2 as a greenhouse gas over 20 years. Therefore, shale gas infrastructure with methane leakage of up to 9% is undermining efforts to slow climate change.

IND194-4

4. Inadequate oversight

Regulation of pipeline safety is not only severely fragmented among dozens of federal, state, and local agencies, but is severely under-resourced in terms of personnel and funding. When regulators are incapable of coping with the existing hazards and damage to water safety and quality, it is extremely unwise to tolerate additional hazardous activities.

There have been a number of pipeline disasters in the current decade alone. A 2010 natural gas line explosion in San Bruno, California killed eight people and damaged or destroyed dozens of homes. Also in 2010, a pipeline oil spill caused more than \$1 billion in damage to the Kalamazoo River.

Jeffrey Wiese, the leading official in oil and gas pipeline safety, admitted to a convention of compliance officers that his agency, the Pipeline and Hazardous Materials Administration ("PHMSA"), has limited enforcement power over safety rules. The PHMSA's budget for pipeline safety has not increased for the past three years, although thousands of miles of new pipeline have been built. The Obama administration sought additional funding for pipeline safety enforcement, but Congress has refused to provide it pursuant to the sequester.

According to Wiese, it is no longer "viable" to use the regulatory process to respond to dangerous conditions, because it takes too long. California Congress member Jackie Speier said that "The [energy] industry has a lock on PHMSA" and on Congress, causing public interests to be "dramatically watered down"—for example, the oil and gas industry has prevented the institution of requirements of remote shutoff valves for pipelines.

Many hazardous materials are carried in pipelines, and over half of the pipeline now in service has been in use for three or four decades, making it likely that at least some areas are affected by corrosion and other sources of failure. Yet, PHMSA has only 135 inspectors, and there are 2.6 million miles of pipeline already in service. Since 2006, PHMSA and cooperating state agencies have inspected only one-fifth of the existing pipeline capacity.

Although Congress increased the maximum fines in 2011, Wiese said that a \$2 million civil penalty is irrelevant to a major multinational corporation, and does not deter industry practices that could lead to major accidents. Strengthening regulation is difficult:

IND194-4

See the response to comment CO14-25. Further, section 4.12.1 of the EIS identifies that some states may also act as PHMSA's agent to inspect interstate facilities within its boundaries; however, PHMSA is responsible for enforcement actions. For the AIM Project, New York and Connecticut are interstate agents that have been delegated authority to inspect interstate natural gas pipeline facilities.

IND194 – David Brunetti (cont'd)

20140929-5050 FERC PDF (Unofficial) 9/27/2014 8:12:14 PM	
IND194-4 (cont'd)	<p>adoption of a new pipeline rule can take as long as three years. Wiese announced that PHMSA is setting up a YouTube channel to persuade industry to voluntarily adopt better safety practices. However, American Petroleum Institute spokesman Brian Straessle said that the pipeline infrastructure is protected by "strong standards in place," and that the industry has financial incentives to prevent incidents and protect the environment.</p> <p>Approving the AIM project would merely add additional potential hazards while the overburdened PHMSA is already struggling to protect public safety.</p>
IND194-5	<p><u>5. Health Risks Related to Air Emissions</u></p> <p>Residents throughout the entire region will be impacted by air emissions from the infrastructure related to the AIM Project. The application states "Algonquin will modify six existing Algonquin compressor stations to add an additional 81,620 hp to its pipeline system as part of the AIM Project. This increase in horsepower will be achieved with the installation of six new compressor units."</p> <p>Air emissions from compressor stations include benzene, toluene, formaldehyde and many other chemicals. The existing emissions and the estimated increase in emissions is not clearly delineated in the application and some of the information about existing equipment is not available to the public. The compressor station expansions at Stony Point and Southeast, NY, Cromwell and Chaplin, CT and Burrillville, RI are sited in regions currently considered non-attainment areas for a variety of emissions. The section about the Oxford, CT compressor station seems to be omitted from the application.</p> <p>Residents along the route of the AIM Project have serious concerns about the increased emissions associated with the expansion and resulting health impacts. Health impacts associated with compressor station emissions include nosebleeds, visual impairment, neurological and respiratory problem, leukemia, aplastic anemia, lung, liver, kidney and cardiovascular disease. Children, pregnant women, elderly and health-compromised populations are particularly vulnerable.</p> <p>Cumulative impacts of the entire proposal should be assessed and a formal Health Impact Assessment (HIA), as outlined by the Centers for Disease Control, should be conducted and included in the Environmental Impact Statement. Baseline testing of air emissions in regions surrounding the compressor stations should be conducted prior to permitting by the state agencies.</p>
IND194-6	<p><u>6. Sedimentation</u></p> <p>Sedimentation, erosion, and potential contamination impacts to waterbodies and wetlands during construction will lower water quality. Additionally, severe compaction of the soil will reduce the ability for water to recharge groundwater supplies. Intervenor note that locating the Project on these lands will create a new conduit for water through the gravel surrounding the pipeline, altering the hydrologic pattern of the watershed lands. Water will run parallel with the new pipeline instead of recharging aquifers and river ecosystems, degrading the quality and quantity of water available to residents.</p>

IND194-5

We disagree with the commentor's characterization of compressor station emissions. FERC staff performed a thorough evaluation of each compressor station and section 4.11.1.3 of the EIS presents the existing emissions at each compressor station, the proposed increases and decreases in emissions, and the resulting final compressor station emissions. Section 4.11.1 of the EIS also clearly states that the modifications at the Oxford Compressor Station in Connecticut would involve the restaging of one existing compressor unit. This work would not result in impacts on air quality or noise. See also the responses to comments SA4-9 and SA4-10.

IND194-6

See the response to comment CO13-9.

IND194 – David Brunetti (cont'd)

20140929-5050 FERC PDF (Unofficial) 9/27/2014 8:12:14 PM

IND194-7

In summary, it is for the above reasons that I oppose this project and urge FERC to do so as well.

Sincerely,

David A. Brunetti
935 Sherman Farm Road
Harrisville, RI 02839

IND194-7

Comment noted.

IND195 – Paul Jamiol

20140929-5052 FERC PDF (Unofficial) 9/26/2014 5:56:10 PM

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

9/26/14

Dear Ms. Bose,

My name is Paul Jamiol. Linda Habib (my wife) and I live at 59 Grove Street, West Roxbury, MA. Our house sits directly across the street from the West Roxbury Crushed Stone Quarry.

IND195-1 | Grove Street--from the condos at number 90, past our house, down to our neighbor's house (Blue Randall at 2426 Centre Street) and the entrance to the Quarry and on up to the signal lights at Baker Street--is subject to and affected by two things. One is the blasting at the Quarry and the other is the heavy and constant use of that stretch of road by 18-wheeler dump trucks (with weights fully loaded up to 108,000 lbs gvw). I would like to address those conditions with regards to the new pipeline and the transfer station being built between our house and Blue Randall's house. The predominant issue is the heavy use by trucks along that stretch of road. We can feel the vibrations of them coming and going in our houses. We feel that that being the case, the pipeline laid along that stretch should be laid with those conditions in mind. For the record, this stretch is approximately 1/8th of mile long.

IND195-2 | In section 2 (Project Description) of the Algonquin Incremental Market Project *Draft Environmental Impact Statement*, Page 29 (under the section In-Street Construction Methods) states that: *A 15:1 sand to concrete mix called flowable fill, or Controlled Density Fill, may be used. The backfill must be compacted to reduce stresses on the pipeline and to ensure the roadway supports the traffic load without settling.* While it says "may", I think that given the heavy use stated above, this Controlled Density Fill must be used in the section of road noted above, for both safety reasons and for the peace of mind of the neighbors living along that stretch.

This document includes a copy of the project page (with highlights) that I cited above, and also maps of the section of of road that we are concerned about.

Thank you for your time and consideration.

Sincerely,

Paul Jamiol
Linda Habib

59 Grove St.
West Roxbury, MA 02132
617-327-1431

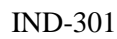
cc: Blue Randall

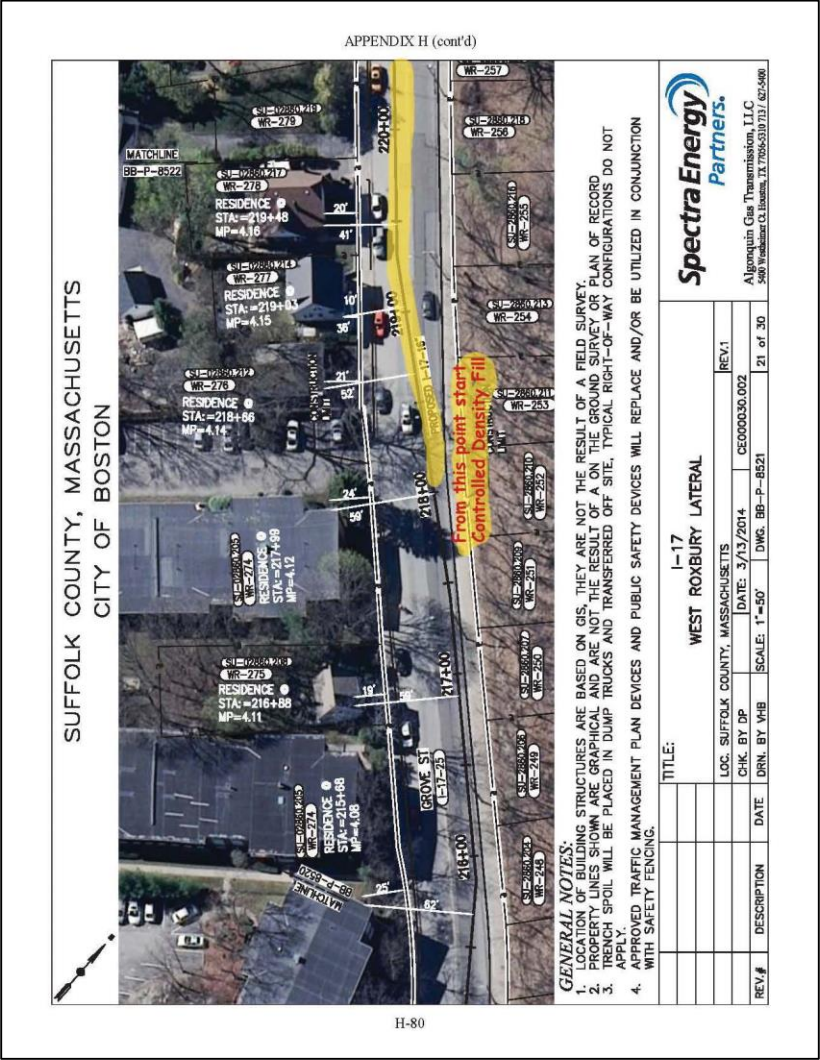
IND195-1

See the responses to comments FA6-1 and LA14-2 regarding studies analyzing blasting impacts and the existence of a natural gas distribution pipeline already present in the road.

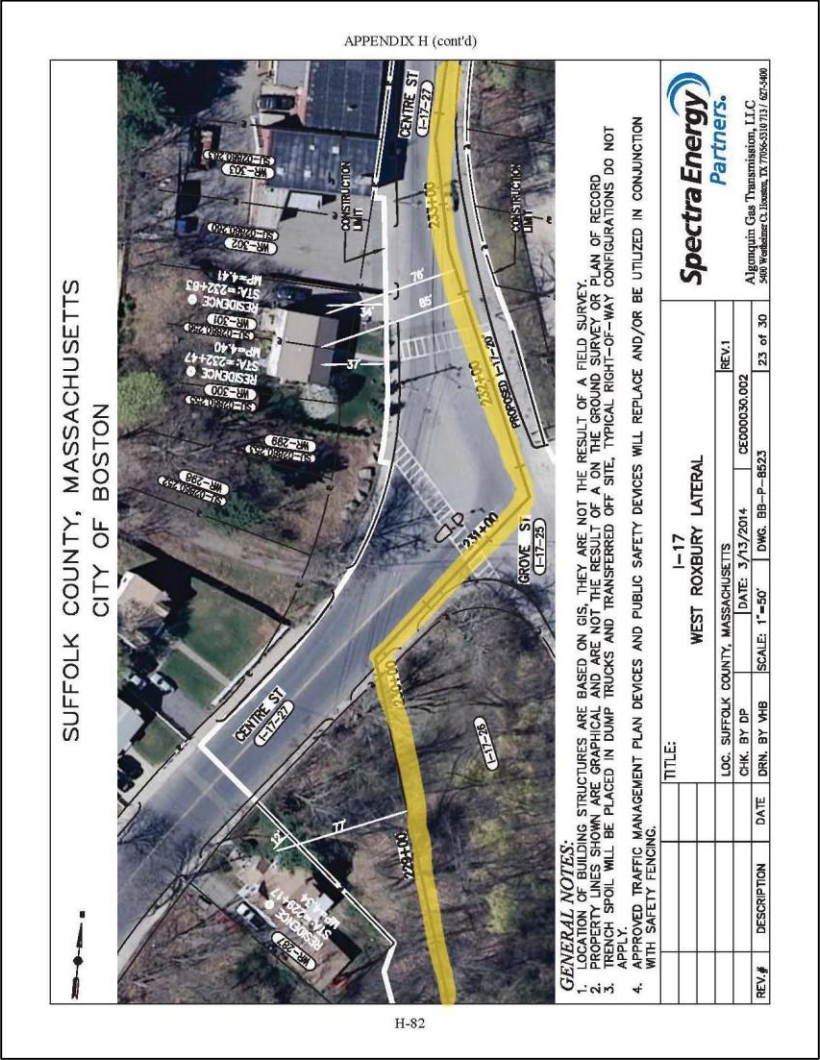
IND195-2

The appropriate fill would be used for the entire Project, including for those portions proposed within roadways.











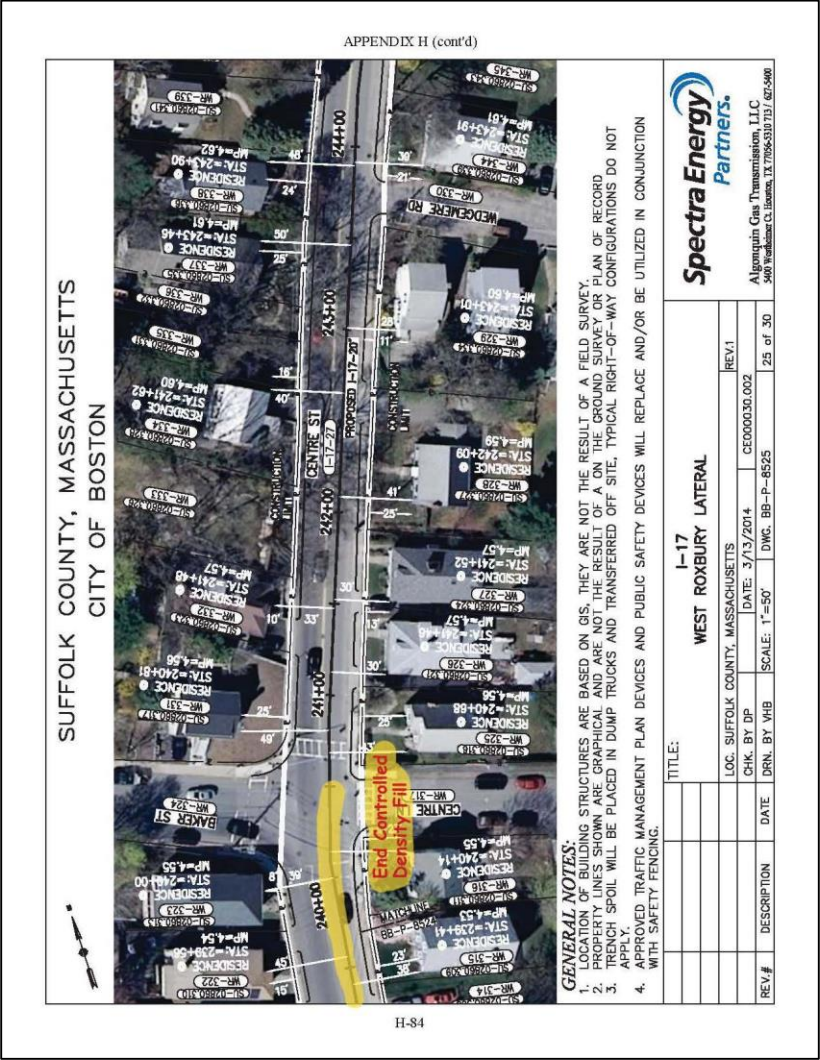
H-83

APPENDIX H (cont'd)

GENERAL NOTES:

- GENERAL NOTES:**
1. LOCATION OF BUILDING STRUCTURES ARE BASED ON GIS, THEY ARE NOT THE RESULT OF A FIELD SURVEY.
 2. DIMENSIONS SHOWN ARE GRABBED FROM THE EXISTING SURVEY MAP PLAN OF RECORD.
 3. TRUCK SPILL WILL BE PLACED IN DUMP TRUCKS AND TRANSFERRED OFF SITE. TYPICAL RIGHT-OF-WAY CONFIGURATIONS DO NOT APPLY.
 4. APPROVED TRAFFIC MANAGEMENT PLAN DEVICES AND PUBLIC SAFETY DEVICES WILL REPLACE AND/OR BE UTILIZED IN CONJUNCTION WITH SAFETY FENCING.

WITH SAFETY FEATURES.		TITLE:		I-17 WEST ROXBURY LATERAL			
REV.#	DESCRIPTION	DATE	CHK. BY	LOC. SUFFOLK COUNTY, MASSACHUSETTS	REV.1		
			DRN. BY DP	DATE: 3/13/2014	CE000030.002		
			SCALE: 1"=50'	DWG. BB-P-8524	24 of 30		



IND196 – Joan Walker

20140929-5051 FERC PDF (Unofficial) 9/29/2014 7:34:26 AM

Joan Walker, Woodstock, NY.

- IND196-1 The Proposed Algonquin Incremental Market project (AIM) Pipeline should be rejected and denied for several reasons including but not limited to the following:
The proposed location for the pipeline presents a potential nightmare scenario for the mother of all disasters. Situated near the spent fuel rods of the Indian Point Nuclear Power Plant and major electrical transmission lines, an explosion, due to leakage or terrorist attack could be worse than disastrous.
- IND196-2 The pipeline would enable and encourage more hydrofracturing for "natural" gas.
The fracking process is fraught with danger due to failed well casings, radioactive drill cuttings and radon gas. The extreme energy inputs and methane leakage make frack gas a greenhouse gas contributor equal to coal.
- IND196-3 Taxpayers and victims of any accidents should NOT be subsidizing a pipeline that is primarily designed to facilitate the export of gas via dangerous LNG terminals

IND196-1 See the responses to comments FA4-25, SA4-2, SA7-4 and CO7-6.

IND196-2 See the responses to comments FA4-24 and SA4-4.

IND196-3 See the response to comment CO15-4.

IND197 – Bernard Vaughey

	<p>Bernard Vaughey 215 Broadway Verplanck, NY 10596-0277 September 26, 2014</p>
	<p>Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street NE, Room 1A Washington, DC 20426</p>
	<p>RE: Algonquin Gas Transmission, LLC, Docket No. CP 14-96, AIM Project Lack of Review of Alternate Routes of Supply</p>
	<p>Dear Secretary Bose:</p>
IND197-1	<p>Why do the DEIS and the FERC review of alternatives explore only single- source delivery contracts, rather than partnerships.</p> <p>In the FERC executive summary, on page ES-9, the DEIS states</p> <p><i>Our analysis of system alternatives included an evaluation of the existing Tennessee Gas Pipeline and Iroquois Gas Transmission systems as well as the planned Connecticut Expansion and Northeast Energy Direct Projects. None of the existing, proposed, or planned natural gas pipelines reach the delivery points required by the Project shippers in southern New England. To provide service to these delivery points, the existing and planned systems would need to be modified by constructing hundreds of miles of new pipeline, much of which would duplicate the existing Algonquin system. This would result in greater environmental impacts than the Project. Consequently, none of the system alternatives provide an environmental advantage over the proposed Project.</i></p> <p>Was this evaluation written by Spectra, or an independent agency reviewing the document?</p> <p>It is understandable that a duplication of delivery systems is very costly, but lack of duplication and/or competition also leads to sole-source suppliers. With increasing supply to provide electrical power generation, is this something that we, as a people, want – a sole-source or company in control of supply? Once electrical power generators have switched over to natural gas from other sources of fuel, will this allow the one or two sources or suppliers of natural gas, the companies that transport the gas, to dictate the price, during times of high demand, and by extension, the price of the electricity?</p> <p>Page 1 of 3</p>

IND197-1

To increase competition and choice, customers can and sometimes do select alternatives that would require more infrastructure to be built by a new pipeline transmission company rather than rely on a smaller build out by the existing pipeline transmission company. The customers for the AIM Project chose Algonquin to provide the requested volumes. This does not mean that the natural gas would necessarily flow exclusively on Algonquin's system from the supply areas. In addition, our analysis indicates that none of the existing systems (Algonquin's or otherwise) are adequate either singly or in combination to provide the requested volume, hence new facilities would be required. Our review of the other companies that could provide comparable service either singly or in combination (i.e., partnership) indicates that these alternatives would result in greater environmental impacts than the AIM Project, and thus would not be environmentally preferable.

IND197 – Bernard Vaughey (cont'd)

IND197-1 (cont'd)	<p>Under alternatives, the DEIS fails to address potential partnerships to get the product, natural gas, from well head to end user. Years ago, a package shipped via FedEx was delivered directly by FedEx. Now, apparently more cost effectively, a recent package was initiated as Fed Ex delivery, but was ultimately delivered by USPS. Why wasn't a similar approach explored in the DEIS by Spectra and the FERC review?</p> <p>In the FERC review of the AIM project, it would appear that Spectra, and only Spectra, can deliver product from the fields to the end user. Why can't that product first go thru an existing gas line – the Tennessee or Iroquois gas line - to <i>their</i> interconnection point with the Algonquin line in Connecticut? Then, Algonquin, using it's already in- place system, with the minimal upstream improvements proposed under the AIM project, could complete the delivery. Why would we need to “construct hundreds of new miles of pipeline.”, duplicating the Algonquin?</p> <p>This alternative suggestion has the potential of eliminating all the additional emission in the Rockland / Westchester area (an air quality non-attainment zone), as well as added impacts to schools, churches, nuclear facilities and residences along new and existing ROW's of the AIM project thru New York. If there is an alternative, such as this, we would not need massive increases in horsepower, with related increases in harmful emissions, the disturbance of waterways and miles of new and existing ROW, risk to new communities along new ROW's, disturbance to parkland areas.</p> <p>This would also eliminate the near-doubling of the Potential Impact Radius in some areas and the addition of new previously unaffected areas.</p>
IND197-2	<p>Have Spectra and FERC discussed and approved the concept of further, future expansion, growth, and capacity of this segment of pipeline thru New York that is not mentioned or addressed in the DEIS for the AIM project?</p> <p>Is FERC, in its evaluation of the AIM project, also factoring in additional capacity for additional or future projects, supposedly not yet before FERC, such as the Atlantic Bridge, the SoNo, or the Access Northeast?</p>
IND197-3	<p>Why is FERC not researching this as part of their DEIS review? Why were alternatives, and partnerships not reviewed in the DEIS for the AIM project, when it appears that access partnerships exist for the ACCESS Northeast project:</p> <p><i>Adequate access to natural gas supply is a critical component to meeting the electric reliability needs of the region. Spectra Energy is well positioned to offer this access to supply through existing interconnects with 7 major interstate natural gas pipelines. Each of these pipelines (Texas Eastern, Transco, Columbia, Tennessee Gas Pipeline, Millennium, Portland Natural Gas and Iroquois) has either recently expanded its delivery capability into the region or is currently developing expansion projects to increase capacity in the near future. These expansions have already resulted in a current level of supply that exceeds pipeline takeaway capacity by 1 billion cubic feet per day.</i></p>

IND197-2 See the responses to comments FA3-5, FA4-24, and LA23-16.

IND197-3 See the response to comment IND197-1.

IND197 – Bernard Vaughey (cont'd)

IND197-4

I believe that, for a number of reasons, the DEIS is flawed, and must be withdrawn. Only after all the missing and requested components, reports and studies are completed and documented on the FERC website for this project; properly prepared, properly portrayed, reviewed and commented on, should consideration be given for a Supplemental Draft Environmental Impact Statement to be published, with a standard, rather than an expedited review period.

Thank you,



Bernard Vaughey

Cc:

Senator Charles Schumer

Senator Kirsten Gillibrand

Assemblywoman Sandy Galef

Supervisor Linda Puglisi

Mayor Theresa Knickerbocker

Daniel Riesel, Esq.

IND197-4

See the responses to comments FA4-1, SA1-12, and SA2-10.

IND197 – Bernard Vaughey (cont'd)

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ALTERNATIVES CONSIDERED

The No Action Alternative was considered for the Project. While the No Action Alternative would eliminate or delay the short and long-term environmental impacts identified in this EIS, Algonquin would be unable to supply an additional 342,000 dekatherms per day of natural gas to its existing mainline system; increase deliveries to the Project shippers at existing delivery points in southern New England; or provide three new delivery points for the Project shippers. We also considered the use of alternative energy sources and the potential effects of energy conservation, but these measures similarly would not satisfy the objectives of the Project, provide an equivalent supply of energy, or meet the demands of the Project shippers. We concluded that the No Action Alternative, alternative energy sources, and energy conservation were not viable alternatives to the proposed Project in the required timeframe.

Our analysis of system alternatives included an evaluation of the existing Tennessee Gas Pipeline and Iroquois Gas Transmission systems as well as the planned Connecticut Expansion and Northeast Energy Direct Projects. **None of the existing, proposed, or planned natural gas pipelines reach the delivery points required by the Project shippers in southern New England.** To provide service to these delivery points, the existing and planned systems would need to be modified by constructing hundreds of miles of new pipeline, much of which would duplicate the existing Algonquin system. This would result in greater environmental impacts than the Project. Consequently, none of the system alternatives provide an environmental advantage over the proposed Project.

We evaluated Algonquin's proposed design for the Project to determine if any alternative designs would be feasible and environmentally preferable to the Project. We determined that alternative designs would result in operational inefficiencies associated with flow characteristics of natural gas within the system, and would shift, but not avoid, environmental impacts from one location to another. For these reasons, we concluded that alternative designs would not be practical or provide an environmental advantage over the proposed Project.

We also considered the feasibility of electric-driven compressor units in lieu of gas-fired units at each of the existing compressor station sites. We concluded that use of electric-driven compressor units would result in additional environmental impacts due to the installation of non-jurisdictional facilities such as electric transmission lines and substations. Although electric-driven units would result in lower operating emissions, Algonquin would be required to comply with its existing air permits at each site. For these reasons, electric-driven compressors would not be preferable to or provide a significant environmental advantage over the proposed Project.

We evaluated route alternatives for the Hudson River crossing and for the West Roxbury Lateral; several minor route variations along different segments of the Project; and site alternatives for M&R stations at the new delivery points in Connecticut and Massachusetts. We determined that none of the route or site alternatives would offer significant environmental advantages over the Project.

MAJOR CONCLUSIONS

We determined that construction and operation of the Project would result in some adverse environmental impacts but most impacts would be reduced to less-than-significant levels. This determination is based on a review of the information provided by Algonquin and further developed from environmental information requests; site visits; scoping; literature research; alternatives analyses; and contacts with Federal, state, and local agencies, and other stakeholders.

IND198 – Bernard Vaughey

Bernard Vaughey
215 Broadway
Verplanck, NY 10596-0277
September 26, 2014

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Spectra/Algonquin Gas Transmission, LLC, Docket No. CP 14-96
Failure to address cumulative impact

Dear Secretary Bose:

IND198-1 Why is it that the DEIS and FERC review of the Spectra/Algonquin Incremental Market (AIM) project referenced above does not fully address the cumulative impacts of an electrical project that could occupy the same piece of property, and potentially cohabitate adjacent alignments?

On July 1, 2013, West Point Partners (WPP) filed paperwork with the New York State Public Service Commission (NYSPSC) for a **1000 MW** electric transmission project. That application was accepted by the NYSPSC in February, 2014. WPP revised and resubmitted their proposed cable routing on May 2, 2014. It was posted on the NYSPSC website for the WPP project on **May 2, 2014**. The underground WPP power cables, 1000 MW, with **either 320,000 Volts DC, or 345,000 Volts AC**, and the proposed 1000 MW converter station are shown on the attached Exhibit CH 01. The information about the location of an adjacent power project was not fully incorporated and evaluated in this DEIS. **It should have been included.** FERC recommends that this study be provided as a mitigation measure (item #41, p 5-25). It is both reasonable and necessary to require that Algonquin produce said study as part of the DEIS. Providing this as a mitigation measure to be addressed after any construction is underway is **NOT ACCEPTABLE**.

The WPP electrical proposal in relation to the AIM proposal should be detailed, NOW, not brushed over, in the current DEIS. What are potential issues between a high-voltage electric project adjacent to a new high-capacity, high-pressure interstate gas transmission line? The people that will be affected by both of these projects should have a right to comment on important **studies that should have been included** in the DEIS – and not deferred until prior to construction of the Stony Point to Yorktown segment, as per FERC's staff's recommended mitigation.


IND198-2 It is both ludicrous, incongruous and shameful to consider that while the "Potential Impact Radius" for the AIM project nearly DOUBLES in heavily populated areas (DEIS Table 4.12.3-

Page 1 of 2

IND198-1 See the response to comment SA7-4.

IND198-2 See the responses to comments FA4-25 and SA7-4. The referenced interference study would be needed before any authorization to proceed with construction.

IND198 – Bernard Vaughey (cont'd)

IND198-2 (cont'd)	1), FERC does not see a need for independent scientific data relative to AC/DC interference, much less an Hazards Analysis prior to any issuance of need or construction permits.
IND198-3	<p>Revisions to the West Point Project were posted May 2, 2014, over one month prior to the issuance of the DEIS, yet the DEIS does not address the revisions. Table 4.8.3-1 indicates no distance crossed, and 0.1 miles west, which does not reflect WPP Exhibit CH 01. The table, and potentially the conclusions for this section, need to be corrected to reflect current information.</p> <p>What are the cumulative effects of these projects, during construction, on the environment, during operation and long term, on an already overburdened portion of the Hudson Valley?</p>
IND198-4	<p>West Point Partners, like Spectra/Algonquin, is asking for agency approval by 1st quarter of 2015. FERC Commissioners and advisers all have a responsibility and an obligation to serve the best interests of the public – not only the energy industry. There are many who feel that FERC is a rubber stamp agency. You must know you operate under microscope with most projects submitted for your review, but none more so than this: FERC Commissioners and advisers are deciding whether or not to allow a massive increase in capacity with a new high-pressure gas pipeline within shouting distance of an aging nuclear reactor, on a known earthquake fault line, just north of New York City. And the gas company in question is talking with developers of an electric converter power project which may run adjacent to the new gas line...and maybe intersect with it in the construction phase. The incongruity of the proposal is mind boggling. The lack of information and scientific independent analysis is staggering. And Spectra and FERC think it will be acceptable to provide this information AFTER construction begins? <u>NO!</u></p> <p>I implore FERC to require Spectra/Algonquin to address the fact that there are glaring errors, omissions, and issues glossed over in the DEIS.</p>
IND198-5	<p>The DEIS MUST BE WITHDRAWN. The entire process should be restarted <u>only</u> after all the missing requested, reasonable and necessary components are in place, properly prepared, properly portrayed, reviewed and commented upon. <u>Only</u> at that point should a Supplemental Draft Environmental Impact Statement be published, with a standard, rather than an expedited review period.</p> <p>Thank you,</p>  <p>Bernard Vaughey</p> <p>Cc: Assemblywoman Sandy Galef Supervisor Linda Puglisi Mayor Theresa Knickerbocker Daniel Riesel, Esq.</p>

Page 2 of 2

IND198-3 See the response to comment SA7-4.

IND198-4 See the responses to comments FA4-25, SA4-2, and SA7-4. The studies needed to determine the environmental impact of the project have been provided and are analyzed in the final EIS. The referenced interference study would be needed before any authorization to proceed with construction.

IND198-5 See the responses to comments FA4-1, SA1-12, and SA2-10.

IND-314

Individuals

IND198 – Bernard Vaughey (cont'd)

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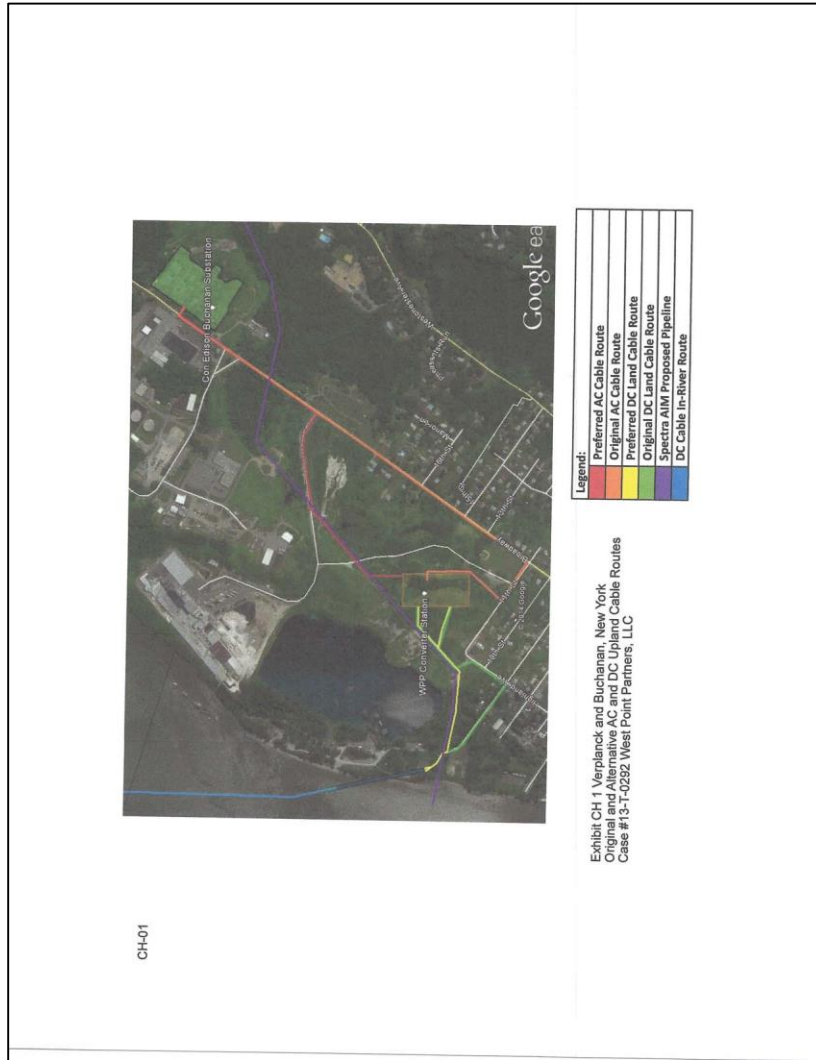
Facility	County, State	Begin MP	End MP	Existing PIR (feet)	Future PIR (feet)
Replacement Pipeline					
Haverstraw to Stony Point Take-up and Relay	Rockland, NY	0.0	3.3	465.7	844.9
Stony Point to Yorktown Take-up and Relay	Rockland, NY	0.0	2.6	465.7	844.9
	Rockland/Westchester, NY	2.6	5.5	NA	844.9
	Westchester, NY	5.5	12.3	465.7	844.9
Southeast to MLV 19 Take-up and Relay	Putnam, NY/Fairfield, CT	0.0	4.5	465.7	844.9
E-1 System Lateral Take-up and Relay	New London, CT	0.0	9.1	113.4	302.3
Loop Extension^a					
Line-36A Loop Extension	Middlesex/Hartford, CT	0.0	2.0	NA	724.2
E-1 System Lateral Loop Extension	New London, Ct	0.0	1.3	NA	226.8
New Pipeline					
West Roxbury Lateral	Norfolk/Suffolk, MA	0.0	5.1	NA	302.3

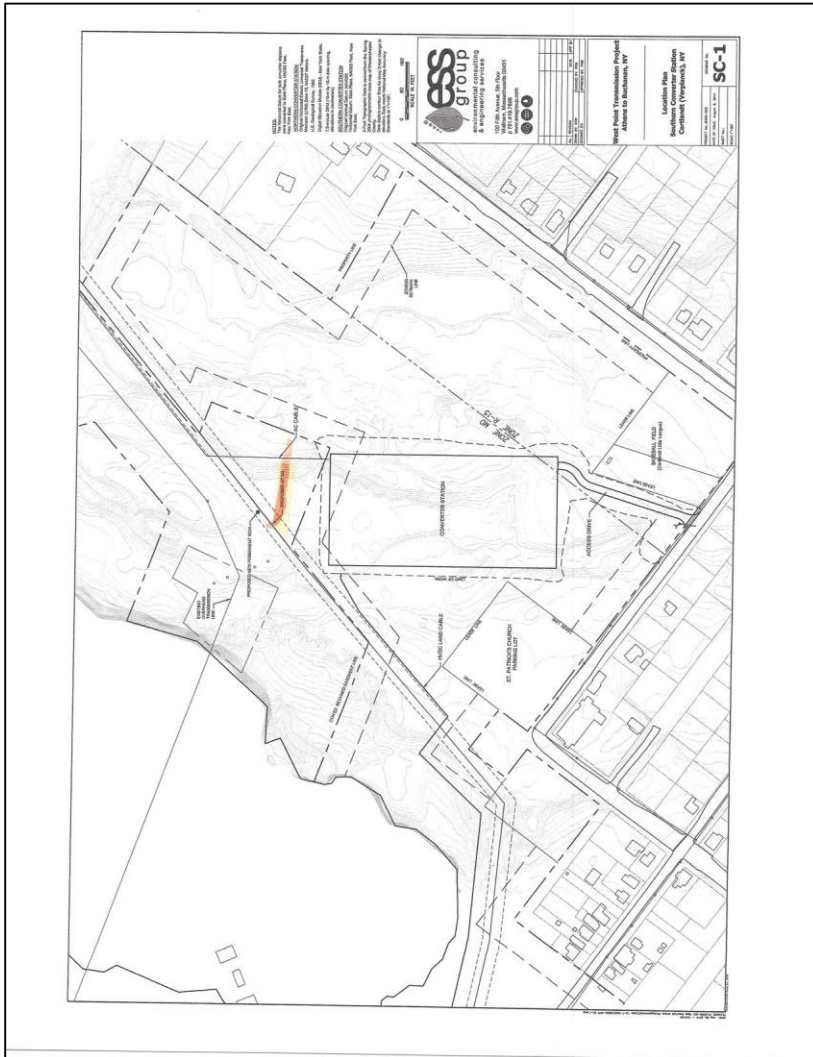
Notes:
 PIR = potential impact radius
 NA = Not Applicable. New pipeline segments or loops do not have an existing potential impact radius.

The service incidents data summarized in table 4.12.2-1 include pipeline failures of all magnitudes with widely varying consequences. Table 4.12.3-2 presents the average annual injuries and fatalities that occurred on natural gas transmission lines for the 5 year period between 2009 and 2013. The majority of fatalities from pipelines are due to local distribution pipelines not regulated by FERC. These are natural gas pipelines that distribute natural gas to homes and businesses after transportation through interstate natural gas transmission pipelines. In general, these distribution lines are smaller diameter pipes and/or plastic pipes that are more susceptible to damage. Local distribution systems do not have large rights-of-way and pipeline markers common to the FERC-regulated natural gas transmission pipelines.

Year	Injuries	Fatalities
2009	11	0
2010 ^a	61	10
2011	1	0
2012	7	0
2013	2	0

^a All of the fatalities in 2010 were due to the Pacific Gas and Electric pipeline rupture and fire in San Bruno, California on September 9, 2010.



IND198 – Bernard Vaughey (cont'd)

IND-318



IND198 – Bernard Vaughey (cont'd)

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The GHG emissions associated with construction and operation of the AIM Project are discussed in more detail in section 4.11.1. Emission of GHGs from the proposed Project would not have any direct impacts on the environment in the Project area. Currently, there is no standard methodology to determine how a project's relatively small incremental contribution to GHGs would translate into physical effects on the global environment. Additionally, natural gas emits less CO₂ compared to other fuel sources (e.g., fuel oil or coal).

The CTDEEP issued its Comprehensive Energy Strategy that includes specific recommendations for increasing the use of natural gas in Connecticut (Comprehensive Energy Strategy, 2013). In Massachusetts, the MAEOEEA produced a strategic plan for 2013 to 2015 that includes reliable, clean, and cost-effective energy in their vision statement, and recommends "initiatives to increase availability of low-cost natural gas, like getting more natural gas into distribution systems and more pipeline capacity across the Commonwealth...." (MAEOEEA, 2013). In December 2013, the governors of the six New England states agreed to an energy initiative designed to bring affordable, cleaner, and more reliable power to homes and businesses across the northeast. This would be accomplished through cooperative investments in energy efficiency, renewable generation, natural gas pipelines, and electric transmission (New England Governors, 2013). Also, the USGCRP's Report states that additional investment into power generating infrastructure may be necessary to offset increasing demand associated with increased temperatures.

Because fuel oil is widely used as an alternative to natural gas in the region in which the AIM Project would be located, we find that the Project would result in the displacement of some fuel oil use, thereby regionally offsetting some GHG emissions.

4.13.9 Reliability and Safety

Impact on reliability and public safety would be mitigated through the use of the PHMSA Minimum Federal Safety Standards in Title 49 CFR 192, which are intended to protect the public and to prevent natural gas facility accidents and failures. In addition, Algonquin's construction contractors would be required to comply with the OSHA Safety and Health Regulations for Construction in Title 29 CFR 1926. We received several comments about potential cumulative impacts relative to safety between the proposed Project as well as the IPEC facility and WPP's proposed West Point Transmission Line (see section 4.12.3). However, we do not anticipate any significant cumulative impacts on reliability or safety to occur.

4.13.10 Conclusion

Recently completed, ongoing, and planned projects in the AIM Project area were identified for inclusion in this cumulative impact analysis (refer to table 4.13-1). The majority of cumulative impacts would be temporary and minor when considered in combination with past, present, and reasonably foreseeable activities. However, some long-term cumulative impacts would occur on wetland and forested and upland vegetation and associated wildlife habitats. Some long-term cumulative benefits to the community would be realized from the increased tax revenues. Short-term cumulative benefits would also be realized through jobs and wages and purchases of goods and materials. There is also the potential that the Project would contribute to a cumulative improvement in regional air quality if a portion of the natural gas associated with the AIM Project displaces the use of other more polluting fossil fuels. In summary, due to the implementation of specialized construction techniques, the relatively short construction timeframe in any one location, and carefully developed resource protection and mitigation plans designed to minimize and control environmental impacts for the AIM Project as a whole, minimal cumulative effects are anticipated when the impacts of the AIM Project are added to the identified ongoing projects in the immediate area.

IND198 – Bernard Vaughey (cont'd)

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We have also received several comments expressing safety concerns about potential interactions between Algonquin's proposed pipeline facilities and the WPP transmission line. Algonquin and WPP have corresponded and met regarding the two projects, and plan to share design drawings. Algonquin has committed to conducting an alternating current/direct current (AC/DC) interference study and incorporating field surveys and comprehensive modeling to identify potential adverse effects on the pipeline from stray currents and from inductive, conductive, and coupling AC/DC effects from nearby AC/DC utilities. After completion of the study, mitigation requirements would be determined. Potential mitigation measures for AC/DC interference could include maximum separation distance, parallel/point mitigation utilizing anodes, potentially controlled impressed current cathodic protection systems, or other measures based on engineering judgment. WPP has committed to installing its cable in accordance with Algonquin's requirements at any point where it would cross the pipeline. **Although we do not anticipate any significant issues, to ensure that safety concerns about potential interactions are adequately addressed, we recommend that:**

- **Prior to construction of the Stony Point to Yorktown Take-up and Relay segment, Algonquin should file with the Secretary its final AC/DC interference study associated with the West Point Transmission Project, documentation of all consultations with WPP, and any additional mitigation measures to address safety-related issues.**

Additionally, we received scoping comments from individuals as well as Entergy concerning the safety of the Project and its proximity to the IPEC facility. Three existing pipelines (24-inch-diameter Northline, 30-inch-diameter L30B pipeline, and 24-inch-diameter Southline) currently cross the Hudson River within Algonquin's mainline right-of-way and are immediately adjacent to the IPEC-protected security barrier. For the Stony Point to Yorktown Take-up and Relay segment of the proposed Project, Algonquin has identified as its proposed route an alternate crossing location of the Hudson River that is located approximately 0.5 mile south of the three existing pipelines. While the proposed route would still cross a portion of IPEC land, it would be about 2,370 feet from the IPEC-protected security barrier around the main facility sites. Land uses between the proposed route and the IPEC-protected security barrier include commercial and industrial. Algonquin would work with Entergy on any requirements for the storage of construction equipment on these parcels when negotiating easements with Entergy and Con Edison for construction of the proposed pipeline. Algonquin has also shared its operation and maintenance procedures with Entergy and would continue to consult with Entergy regarding the use of Entergy-owned or leased land along the proposed route.

Entergy also commented about the potential impacts of the new 42-inch-diameter pipeline crossing the existing pipelines. To minimize potential impacts on the existing line, Algonquin would locate the existing pipeline using above-grade visual cues, electronic pipe locators, probing, and soft digging methods. Once the pipeline is located and identified, pipe stress calculations could be completed for equipment crossings and surface loads. If necessary, Algonquin would provide additional cover; install timber mats, steel plating, or temporary air bridging; utilize a combination of these; or avoid the crossing in order to minimize or avoid impacts on existing utilities. During construction, Algonquin would use soft digging methods to excavate utility lines. Excavator buckets without teeth or side cutters would be used, and lines could be shielded with rock shield or plywood. Utility lines would be supported from below or by a beam installed across the top of the trench. For highly sensitive lines, Algonquin would develop a site-specific work plan for working near the utility.

Entergy commented about concerns on the purging of gas from the existing 26-inch-diameter pipeline, Algonquin would not have any purging operations on IPEC property. Blowing down the existing 26-inch-diameter pipeline would occur either upstream or downstream of the IPEC facility. A

IND198 – Bernard Vaughey (cont'd)

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- b. the noise mitigation that Algonquin implemented at the start of drilling operations; and
 - c. any additional mitigation measures that Algonquin would implement if the initial noise measurements exceeded an L_{dn} of 55 dBA at the nearest NSA and/or increased noise is over ambient conditions greater than 10 decibels. (Section 4.11.2.3)
38. Algonquin shall file a noise survey with the Secretary **no later than 60 days** after placing the authorized units at the Stony Point and Chaplin Compressor Stations in service. If a full load condition noise survey of the entire station is not possible, Algonquin shall instead file an interim survey at the maximum possible horsepower load and file the full load surveys **within 6 months**. If the noise attributable to the operation of all of the equipment at the compressor station under interim or full horsepower load conditions exceeds an L_{dn} of 55 dBA at any nearby NSAs, Algonquin shall file a report on what changes are needed and shall install the additional noise controls to meet the level **within 1 year** of the in-service date. Algonquin shall confirm compliance with the L_{dn} of 55 dBA requirement by filing a second noise survey with the Secretary **no later than 60 days** after it installs the additional noise controls. (Section 4.11.2.3)
39. Algonquin shall file noise surveys with the Secretary **no later than 60 days** after placing the authorized units at the Southeast, Cromwell, and Burrillville Compressor Stations in service. If a full load condition noise survey of the entire station is not possible, Algonquin shall file an interim survey at the maximum possible horsepower load and file the full load surveys **within 6 months**. If the noise attributable to the operation of the modified compressor station at full or interim power load conditions exceeds existing noise levels at any nearby NSAs that are currently at or above an L_{dn} of 55 dBA, or exceeds 55 dBA L_{dn} at any nearby NSAs that are currently below 55 dBA L_{dn} , Algonquin shall file a report on what changes are needed and shall install the additional noise controls to meet the level **within 1 year** of the in-service date. Algonquin shall confirm compliance with the above requirement by filing a second noise survey with the Secretary **no later than 60 days** after it installs the additional noise controls. (Section 4.11.2.3)
40. Algonquin shall file noise surveys with the Secretary **no later than 60 days** after placing the Guilford, Willimantic, Oakland Heights, and West Roxbury M&R Stations and the proposed new Clapboard Ridge Road MLR in service. If the noise attributable to the operation of any M&R Station or MLR at full load exceeds an L_{dn} of 55 dBA at any nearby NSA, Algonquin shall file a report on what changes are needed and shall install the additional noise controls to meet the level **within 1 year** of the in-service date. Algonquin shall confirm compliance with the above requirement by filing a second noise survey with the Secretary **no later than 60 days** after it installs the additional noise controls. (Section 4.11.2.3)
41. **Prior to construction of the Stony Point to Yorktown Take-up and Relay segment**, Algonquin shall file with the Secretary its final AC/DC interference study associated with the West Point Transmission Project, documentation of all consultations with WPP, and any additional mitigation measures to address safety-related issues. (Section 4.12.3)
42. **Prior to the end of the draft EIS comment period**, Algonquin shall file with the Secretary the final conclusions regarding any potential safety-related conflicts with the IPEC based on the Hazards Analysis performed by Entergy. If Entergy's Hazards Analysis is not yet complete, Algonquin shall provide an update on its status and a schedule for anticipated completion. If, upon completion of the Hazards Analysis, additional mitigation measures are required to address safety-related issues or conflicts, **prior to construction in the vicinity of the IPEC facility**, Algonquin shall file with the Secretary, for review and written approval by the Director of OEP, a site-specific construction and mitigation plan for the IPEC developed in consultation with Entergy. (Section 4.12.3)

IND199 – Margery Schab

20140929-5056 FERC PDF (Unofficial) 9/26/2014 10:28:43 PM

Margery Schab
 530 East 90th Street, Apt 2G
 New York, NY 10128
 telephone: 212.410.2366 • email: mschab@aol.com

RE: FERC Comment on the Spectra Algonquin Incremental Market Project.
 Docket #CP14-96-000;

- IND199-1 The DEIS is fatally flawed and should be withdrawn to reflect the real cumulative environmental impacts of the building of this pipeline. The information presented to the public is incomplete; therefore depriving the public the opportunity to address the real environmental impacts this project will have on the Northeast region of the United States and beyond into Canada.
- IND199-2 I have written many comments to various Draft Environmental Impact Statements some submitted by Spectra Energy. None including the above Spectra Algonquin project have addressed the cumulative impacts infrastructure construction sites will have on the areas not only where the pipeline will be built to also to the areas where the pipeline joins other infrastructure projects, gathering lines, metering stations and compressor stations eventually distributing the fracked gas to markets, its eventual final stop. The exploration and production processes transform the landscape into expansive industrial sites that are detrimental to the vitality of rural areas and its communities, large estuaries of pristine water and indigenous enterprises such as organic and dairy farming, wine industry, and tourism.
- IND199-3 Spectra seems in a rush for approval from FERC. However, the National Environmental Policy Act (NEPA) requires an analysis of the entire range of a project's impacts "whether direct, indirect, or cumulative." The Algonquin Incremental Market Project is subject to this requirement and the present DEIS submitted fails to comply with this requirement because the DEIS has separated the Algonquin Project from the development of the Marcellus shale well sites. There is a disconnect to reality since the Marcellus shale gas is intended to be transported to markets through this very pipeline. (See 1st attachments. Maps including overview from the DGEIS page 52, fig. Figure 2.1-1 AIM Project Project Overview Map)
- IND199-4 Moreover, the purposes of the application of Spectra to build the Algonquin Pipeline are to distribute to markets the new "abundant" resource of Natural Gas from the Marcellus Shale. The large international corporations, for example, Exxon Mobil, Statoil, Royal Dutch Shell, Chevron, and Chesapeake among others have invested greatly in Marcellus Shale development and it would be logical to expect that they would want their investments shipped to markets. Therefore, the well sites must be considered in the DEIS. Large pipeline infrastructure will stimulate more fracked gas development. The Algonquin Pipeline will carry Marcellus Shale Gas.

IND199-1 See the responses to comments FA4-1, FA4-24, and CO15-4.

IND199-2 See the response to comment FA4-24.

IND199-3 See the response to comment FA4-24.

IND199-4 See the responses to comments FA4-24 and SA4-4.

IND199 – Margery Schab (cont'd)

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IND199-4
(cont'd)

However, avoidance of appropriate scoping on environmental impacts is indicated on page ES-8 of the DEIS. The following is written:

"We received numerous comments during scoping for the Project about cumulative impacts associated with development of natural gas reserves (including hydraulic fracturing) in the Marcellus shale region. Activities associated with Marcellus shale development would occur outside of the Project area's region of influence. As a result, the local resources that may be affected by Marcellus shale development would not be affected by the Project, and local resources affected by the Project would not be affected by development in the Marcellus shale region."

This is a significant contradiction from the facts. Looking at a map of the area in the attachments, it is extremely likely that the Algonquin Incremental Market Project will transport the Natural Gas produced in the Marcellus and Utica Shales from Pennsylvania because it is the closest source. No effort has been made to account for the hazards now introduced into the pipeline or the hazards from the compressor stations along the way that propel this gas to market. If these new additions to the Algonquin Pipeline are for transporting the fracked gas; therefore, the cumulative impact must include the environmental risks in fracked gas which currently DEIS does not.

IND199-5

Moreover, fossil fuels, unlike renewable sources of energy, are finite. To permit such infrastructure expansion is short sighted since there are, at most, only a couple of decades of gas in the shales. (See Forbes, "The Popping of the Shale Gas Bubble" by Bill Powers, page 2)The entire process of the production of Shale gas from its well sites to its transportation through metering stations, compressor stations and gathering lines all have detrimental environmental impacts. In addition, methane leakage of various stations along the pipeline route add up and therefore, contribute to Global warming. The scope of the cumulative environmental impact is too small. Another reason the DEIS should be withdrawn and rewritten.

IND199-6

The following remarks by Helge Lund, CEO of Statoil (which has large investments in the Marcellus Shale). These were given at the 2014 Spring Energy Policy Conference on May 8, 2014 at Columbia University. It gives an insight as to the energy companies' position regarding caring for the natural environment and the life that is sustained in it. "Statoil, and I think for the rest of the Oil and Gas Industry, a policy framework supporting a sustainable future for our Industry, is of great importance." He framed the above statement as a mission of the industry. On the contrary, I hope this is not the mission of our Federal Energy Regulatory Commission (FERC). I hope that this Government's commission was established to regulate private industry in order to protect the health and well being of the population, not sustainable economic returns for the fossil fuel industry.

Here is another quotation from the summary of Mr. Lund's talk taken from the site of the Energy Policy Institute at Columbia University. "Helge Lund, President and CEO of Statoil, discussed the role of energy policy in economic growth and competitiveness, the future of oil majors, and the importance of a global carbon price in addressing the climate challenge. Mr. Lund noted in his keynote presentation that escalating costs have made the

IND199-5

See the response to comment FA4-23 for additional information regarding Algonquin's methane emission minimization efforts. See the responses to comments CO12-13 and CO14-55 for additional information regarding GHG impact assessments prepared for the Project.

IND199-6

The commission does not regulate the production of natural gas or the siting of these facilities. See also the response to comment CO9-18.

IND199 – Margery Schab (cont'd)

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IND199-6
(cont'd)

current operating model of the oil and gas industry unsustainable. "Half of the companies in Statoil's peer group have less than 10% return on capital, which is not acceptable in a high-risk industry. We need to improve capital efficiency, build balance sheets and work with other companies along the supply chain to reduce our costs."

In other words, the industry is dealing with high costs of exploration and production and has to trim those costs to make a profit. Also they need capital(investments) to continue their exploration and production of fossil fuels. The mission of our Governmental agencies is not to solve the economic problems of the industry, especially these international corporations who have one interest, their bottom line and return on equity.

Bill McKibbin, the founder of 350.org, said we are addicted to fossil fuels which is true. However, our time of complete dependence on fossil fuels is coming quickly to an end. For the future health of our country if not the planet is that we must change and we can change. Apple now relies on solar power for the various services it provides. Facebook and Google are changing to renewables. The Brookhaven National Laboratory in Long Island is working on battery development. The Rockefeller Brothers Fund is divesting its financial portfolio of fossil fuel investments.

IND199-7

Over 300,000 people marched on September 21 to show their concern for the changes in the climate. Our addiction has hit us personally, with our own losses from Sandy. Humanity has very little time to waste. We have to end our gluttonous addiction to fossil fuels. It was a nice party while it lasted.

It is time to establish our real priorities for our future. Water, soil and air are necessary ingredients to sustaining our lives. We must chart a different path and choose life for those who follow us. Our civilization will be different and not as luxurious as we have had, but we will be alive as a species. To choose the correct path to a future, we need leadership from our Government leaders and agencies. I ask that you withdraw the DEIS and replace it with one that addresses the facts because we truly are in a Public Climate Crisis.

Respectfully submitted
Margery Schab

IND199-7

See the responses to comments FA4-1 and FA4-23.

IND199 – Margery Schab (cont'd)

The attachments to this letter are too voluminous to include in this EIS. They are available for viewing on the FERC website at <http://www.ferc.gov>. Using the "eLibrary" link, select "General Search" from the eLibrary menu, enter the selected date range and "Docket No." excluding the last three digits (i.e., CP14-96-000), and follow the instructions. For assistance please contact FERC Online Support at FERCOnlineSupport@ferc.gov or toll free at 1-866-208-3676, or for TTY, contact 202-502-8659. The Category/Accession number for this submittal is 20140929-5056.

IND200 – Bernard Vaughey

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215 Broadway
Verplanck, NY 10596
September 24, 2014

Legislator Peter B. Harckham
Majority Leader, Westchester County Board of Legislators
800 Michaelian Office Bldg.
148 Martine Ave.
White Plains, New York, 10601

RE: Parkland Alienation and AIM

Dear Legislator Harckham,

IND200-1 Thank you for your concern about the potential impact of the Spectra/ Algonquin Incremental Market (AIM) project on our precious Westchester County parkland. Your December 5, 2013 letter to the Federal Energy Regulatory Commission (FERC) was greatly appreciated. I believe further comments from you will be needed – and very quickly. The official comment period closes next Monday, September 29, 2014.

Could you please advise FERC, and in doing so, also the residents of Westchester County of the status, and potential resolution of the question of parkland alienation, as it relates to the proposed AIM project?

In the pre-filing and DRAFT Environmental Impact Statement (DEIS) documents on file for this proposed gas line project, Algonquin indicates that the existing 26-inch gas line is located within a 6-foot wide permanent easement through Blue Mountain Park, in the Town of Cortlandt. Spectra/Algonquin indicates that that easement also provides for a 75-foot wide maintenance easement.

Could you please address the following:

- 1) Was parkland alienation ever granted for the 6-foot easement? Is it an easement or a Right of Way (ROW)? Was it for specific property, with specific description / definition?
- 2) Does Spectra/Algonquin have or need parkland alienation for the 75-foot maintenance easement they reference in their paperwork?
 - a) If Spectra/Algonquin does NOT have a parkland alienation agreement for the 75-foot maintenance easement, why not? It would be likely that there would be restrictions and/or impact that would be subsequently placed on the property with

IND200-1

See the response to comment SA4-14.

IND200 – Bernard Vaughey (cont'd)

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IND200-1 (cont'd)	<p>the easement agreement – such as prohibition of the land returning to its natural forest state, trees removed, prohibitions on structures, restrictions for security reasons, etc. Isn't parkland alienation required when restrictions are placed on parklands?</p> <p>3) Spectra/Algonquin asserts in their documents that they do not need parkland alienation for short term use. Is this correct? What is Westchester County's position in this regard?</p>
IND200-2	<p>4) Algonquin has their existing 26-inch gas line within a currently defined 6-foot ROW. It is highly unlikely that Spectra/Algonquin will be able to physically fit the larger 42-inch gas line, with the related larger radius bends, turns and fittings, within the same 6-foot wide easement .</p> <p>Is that 6-foot Permanent easement width a clearly defined area, with set limits, as it would be for anyone else crossing another's property, or is that a general location description, to be modified and changed at will, with Spectra/Algonquin giving the County new limits, maybe the same location, maybe not, once they have completed their installation?</p> <p>a) If it is the first, a defined area, don't they need permission to "go outside the lines"? In the DEIS, it indicates that upon completion of construction, Algonquin will file and record "as-built" drawings with the County. Is this acceptable to the people of Westchester County? What is the interpretation of the owner of this property, Westchester County?</p> <p>Is the following a simplification of the question: There is a current existing 6- foot wide permanent Right of Way for the existing 26-inch gas line. With the removal and subsequent installation of the proposed new, larger, 42" (3 ½ foot) pipeline, in the same trench, does Algonquin have to stay within those ROW lines? If not, why not?</p> <p>b) Does Algonquin need permission and/or prior approval to go outside those established easement or ROW lines, and will new or modified parkland alienation documents be needed/required? Would those updated parkland documents be needed to approve alienation of additional property, before or after the actual work is done? Would that approval be at the County or State Level?</p> <p>c) If approvals are needed, can Spectra/Algonquin proceed with the pipeline replacement / upgrade prior to approvals being granted? Is this reasonable?</p>
IND200-3	<p>5) Spectra/Algonquin indicates they have met with County officials. Spectra indicates in the DEIS they will pay rent for the ATWS (additional temporary work sites) and they will</p>

IND200-2 Algonquin has indicated that the permanent right-of-way would remain 6 feet wide within the Blue Mountain Reservation. The existing 26-inch-diameter pipeline would be removed and replaced with the new 42-inch-diameter pipeline in the same trench. The permanent right-of-way would not change or move as a result of the Project. See section 4.8.5.1 of the EIS for a description of the Project-related activities on the Blue Mountain Reservation.

IND200-3 The temporary right-of-way through Blue Mountain Reservation would include restoration and revegetation to preconstruction cover types in order to avoid long-term significant habitat changes. The "rent" to be paid for this use is subject to the negotiation between Algonquin and the owner of the land.

IND200 – Bernard Vaughey (cont'd)

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IND200-3
(cont'd)

be removing trees from along the existing pipeline ROW. These mature trees will not be replaced. They cannot be replaced, at least in kind. Therefore, I ask:

- a) How much "rent", in total dollars, will the taxpayers of Westchester, and the users of this park, realize - and when?
- b) What is that rent figure based upon? Who determines that figure?
- c) Is that "rent" in addition to, or in lieu of increased property taxes for the larger, pipe, and it's significantly increased and carrying capacity?
- d) What will these added funds be used for? Will they be used for currently unfunded improvements within the park? General park operations? General Fund? Please clarify.
- e) Will these payments (rent) include the Temporary Access Roads (TAR) Algonquin/Spectra will use?
- f) Will the "rent" address compensation for the removal of mature trees and the widening of current seasonal roads in the park? Roads that will be used to bring heavy large equipment, pipe, and other materials to work areas in the park?
- g) Will the "rent" adequately compensate the People of Westchester County who cannot fully use the park for recreation during all the construction periods?

It is **urgently requested** that you address these issues with FERC, as it may affect their Draft Environmental Impact Statement (DEIS). As I stated at the start of this letter, the official comment period for the DEIS currently under review ends in just days - this coming **Monday, September 29, 2014**.

Sincerely,




Bernard Vaughey
Cc:
Assemblywoman Sandy Galef
Supervisor Linda Puglisi

IND200 – Bernard Vaughey (cont'd)

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WESTCHESTER COUNTY **BOARD OF LEGISLATORS**
Voice of the People of Westchester County for over 300 years

Peter B. Harckham
Majority Leader
Legislator, 9th District
Chair, Committee on Rules
Chair, Sub-Committee on Septic Systems



Committee Assignments:
Budget & Appropriations
Environment & Energy
Government Operations
Government Reform, Efficiency & Savings
Legislation
Public Safety & Security

Via FERC E-Filing
December 5, 2013

Hon. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, D.C. 20426

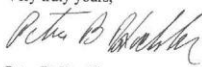
**Subject: Supplemental Scoping Comment, Algonquin Incremental Market Project;
FERC Docket No. PF-13-16-000; Spectra Energy/Algonquin Transmission, LLC**

Dear Secretary Bose:

This comment supplements the October 14, 2013 correspondence and comments that I previously submitted through e-filing regarding the scoping for the Algonquin Incremental Market Project ("AIM Project") proposed by Algonquin Gas Transmission, LLC.

The proposed AIM Project will traverse Westchester County-owned parkland known as Blue Mountain Reservation in Town of Cortlandt, New York. New York law often requires approval by the New York Legislature for the alienation or conversion of municipal parkland for non-park uses.¹ A review of the New York legislative sessions does not show alienation approval by the New York Legislature for the Algonquin pipeline passing through Blue Mountain Reservation.² The AIM Project should be evaluated as to whether alienation approval by the New York Legislature is required for the Algonquin pipeline and/or its expansion.

Thank you for considering this additional comment. Please do not hesitate to contact me at (914) 995-2800 if I can be of assistance.

Very truly yours,


Peter B. Harckham
Majority Leader

cc: Westchester delegation to the NY Senate and NY Assembly

¹ See generally, New York State Office of Parks, Recreation and Historical Preservation, HANDBOOK ON THE ALIENATION AND CONVERSION OF MUNICIPAL PARKLAND IN NEW YORK (rev. Mar. 2012), available at <http://nysparks.com/publications/documents/AlienationHandbook.pdf>.
² See, e.g., 1950 N.Y. Laws, 1951 N.Y. Laws, 1952 N.Y. Laws [session laws during pipeline construction].

Tel: (914) 995-2810 • Fax: (914) 995-3884 • E-mail: Harckham@westchesterlegislators.com

800 Michaelian Office Bldg., 148 Martine Avenue, White Plains, N.Y. 10601 • www.westchesterlegislators.com • 914.995.2800 (main voice)

IND200 – Bernard Vaughey (cont'd)

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Village Park (Village of Buchanan)

This Village Park, owned by the Town of Cortlandt Manor – Village of Buchanan, is a municipal park about 43 acres in size. According to the County of Westchester Department of Planning, the land use within the park is classified as open space designated for municipal and park purposes (Westchester County, 2014a). The Stony Point to Yorktown Take-up and Relay segment of the Project would cross the park at about MP 5.1.

The Project would cross this park for about 313 feet along a wooded area at the back of the property. This area is about 165 feet from the portion of the property used for public recreation. Construction activities would be completed within a few months between March and October 2015, which coincides with the recreation season. The intervening woodland would provide a visual buffer during project construction; however, temporary construction noise and dust impacts could still occur. A new easement would be required for construction and operation of the pipeline as it falls within the portion of this segment that deviates from Algonquin's existing right-of-way. However, the right-of-way would not preclude use of the park. Algonquin has committed to coordinating with the Town of Cortlandt (the landowner for the Village Park) regarding the proposed crossing of this park.

Blue Mountain Reservation

The Blue Mountain Reservation is a 1,538-acre park located in the Town of Cortlandt, New York, and managed by Westchester County. The reservation is characterized by steep topography, rugged terrain, and the wide presence of exposed bedrock. The reservation offers trails for hiking and biking, including the two peaks of Blue Mountain and Mt. Spitzenberg (Westchester County, 2014b). The Stony Point to Yorktown Take-up and Relay segment of the AIM Project would cross the Blue Mountain Reservation from about MPs 6.7 to 8.1 and again between MPs 8.4 and 8.5.

The new 42-inch-diameter pipeline would replace the existing 26-inch diameter pipeline within a 6-foot-wide permanent easement granted in 1952 by the Westchester County Park Commission and the Westchester County Board of Supervisors. That easement also provides for a 75-foot-wide maintenance easement. Upon completion of construction, Algonquin would file and record as-built drawings with the county. A total of about 18.8 acres of temporary construction workspace would be required within the Blue Mountain Reservation for construction of the AIM Project. Of that amount, 1.1 acres would be within existing permanent right-of-way. No new permanent right-of-way would be added within the reservation, and no new easement would be required. The AIM Project would require ATWS within the Blue Mountain Reservation for up to a 6-month period; the process for approval of this ATWS would be defined by Westchester County.

Construction noise, dust, tree clearing, and traffic would temporarily impact the Blue Mountain Reservation during Project construction. Surrounding woodland would largely screen visual impacts on recreational/aesthetic use of the reservation. After construction, all impacted areas within the Reservation would be returned to their preexisting use, and although long-term temporary impacts would occur as a result of tree clearing, no permanent impacts would occur.

We received comments regarding the need to minimize construction impacts and protect the recreational use and aesthetic character of the park. On January 28, 2014, Algonquin met with Westchester County officials to address specific issues related to construction of the pipeline through the reservation and continued operation of Algonquin's facilities, and to request approval for additional workspace from the county. As mitigation for crossing the reservation, Algonquin would pay rent to Westchester County for its ATWS, and would pay compensation for trees removed along the right-of-way.

IND200 – Bernard Vaughey (cont'd)

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New York City Catskill Aqueduct

The New York City Catskill Aqueduct channels New York City's water supply system from the Catskill/Delaware Watersheds. The Stony Point to Yorktown Take-up and Relay segment of the AIM Project would cross the Catskill Aqueduct at approximate MP 10.3 on Croton Avenue near the Cortlandt M&R Station. The NYCDEP manages this aqueduct.

As currently proposed, the 26-inch-diameter pipeline and casing pipe that crosses the aqueduct would be removed and the 42-inch-diameter pipeline would be installed within a new casing pipe above the aqueduct. As with the existing pipeline, the new pipeline would be located above the aqueduct and would rest on concrete pads to provide adequate separation and protection for the aqueduct pipe. Algonquin continues to consult with the NYCDEP regarding this crossing. Algonquin is currently evaluating an alternative that would relocate this segment 50 feet to the south of the existing 26-inch pipeline. This modification would place the new 42-inch pipeline at the edge of Algonquin's existing right-of-way and would require additional permanent easement and temporary construction workspace (see section 3.5.4). As discussed in section 4.3.2, we are recommending that Algonquin provide a site-specific crossing plan developed in consultation with the NYCDEP prior to the end of the draft EIS comment period.

Sylvan Glen Park Preserve (Granite Knolls Park West)

The Sylvan Glen Park Preserve is a park located on the west side of Stony Street in the Town of Yorktown. The preserve is the site of a former quarry that supplied honey-colored granite for the approaches to the George Washington and Whitestone bridges. The reserve contains 5.0 miles of trails used for hiking and dog walking and is open year-round. Old cables, discarded slabs of granite, and an explosive shed are a few of the remnants along the trails in the reserve (New York-New Jersey Trail Conference, 2014).

The Stony Point to Yorktown Take-up and Relay segment of the Project crosses parcels within the Sylvan Glen Park Preserve (also referred to by commentators as Granite Knolls West) terminating at the west side of Stony Street. The crossings would occur on existing right-of-way for a total distance of about 1.2 miles, from about MPs 11.0 to 11.8 (with a short separation where the pipeline leaves the park property) and MPs 11.9 to 12.3. A new launcher/receiver and pressure regulating facility would be constructed and operated at MP 12.3 on a parcel within Sylvan Glen Park Preserve. In addition, Algonquin proposes to use 15.0 acres in Sylvan Glen Park Preserve as a pipe and contractor ware yard (Yorktown Yard).

In 1952, Loyola Seminary granted Algonquin a 50-foot-wide permanent easement for a pipeline and appurtenant facilities under and upon the land in what is now the Sylvan Glen Park Preserve. The Town of Yorktown acquired the Loyola Seminary property in 1981 for park purposes. The conversion to a park use did not extinguish Algonquin's existing easement. The AIM Project replacement pipeline would be installed within the existing permanent easement. The new launcher/receiver and pressure regulator facility would require about 0.5 acre of new permanent easement. ATWS and the Yorktown Yard would cover a larger area but existing for no more than 10 months.

The Town of Yorktown identified two hiking trails (High Quarry and Turtle Pond trails) that it wished to remain open during Project construction, and a historic lime kiln that it expects the New York SHPO would want maintained rather than demolished. We also received a scoping comment expressing concern about damage to this kiln. Phase II archaeological evaluation is in progress for this site (see section 4.10.1).

IND200 – Bernard Vaughey (cont'd)

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Construction activities, noise, and dust would impact recreational use of this area. Algonquin would place timber mats over the High Quarry and Turtle Pond trails, as requested by the town, in order to keep them open during construction. Algonquin would mitigate construction impacts by installing safety fencing around excavations left overnight, installing signage, and watering regularly to control fugitive dust. After the construction period, Algonquin would return the construction area to its preexisting use; however, 0.5 acre of land would be permanently impacted by the new easement for the launcher/receiver and pressure regulator facility. Algonquin must file documentation that it has completed NHPA section 106 consultation with the New York SHPO before construction could begin (see section 4.10.5).

New York Critical Environmental Areas

In New York State, local agencies may designate specific geographic areas within their boundaries as CEAs. State agencies may also designate geographic areas they own, manage, or regulate. To be designated as a CEA, an area must have an exceptional or unique character with respect to one or more of the following:

- a benefit or threat to human health;
- a natural setting (e.g., fish and wildlife habitat, forest and vegetation, open space and areas of important aesthetic or scenic quality);
- agricultural, social, cultural, historic, archaeological, recreational, or educational values; or
- an inherent ecological, geological, or hydrological sensitivity to change that may be adversely affected by any change.

Algonquin identified two CEAs that would be crossed by the AIM Project (NYSDEC, 2014b):

- Hudson River CEA: The Stony Point to Yorktown Take-up and Relay segment in Westchester County would cross the Hudson River from MPs 3.2 to 3.9. This area is designated as a CEA. The Project would cross the Hudson River using the HDD method to avoid impacts on the CEA. Specifically, the crossing would be south of the Hudson River Mile 44-56 habitat, and avoid the Iona Island and Haverstraw Bay Significant Coastal Fish and Wildlife Habitats located to the north and south, respectively. The Project would also avoid the Hudson Highlands State Park Preserve, which lies within the coastal zone north of the Project. Therefore, no impacts on these areas would occur.
- County and State Park Lands CEA: The Stony Point to Yorktown Take-up and Relay segment of the Project would cross this CEA from MPs 6.7 to 8.1 and again from MPs 8.4 to 8.5. This CEA area is associated with the Blue Mountain Reservation (see the discussion of the Blue Mountain Reservation above).

State of New York Parkland Alienation

In New York, the Public Trust Doctrine requires state legislative approval when there is a "substantial intrusion on parkland for non-park purposes, regardless of whether there has been an outright conveyance of title and regardless of whether the parkland is ultimately to be restored" (Friends of Van Cortlandt Park v. City of New York, 2001). Therefore, municipalities proposing to permit a non-park use on parkland must seek approval from the New York State Legislature, a process called "alienation of

IND200 – Bernard Vaughey (cont'd)

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parkland.” New York courts, nonetheless, have recognized that there are de minimis exceptions to the Public Trust Doctrine that have a time and area component. In particular, minor uses of parkland for non-park purposes that do not interfere with public use do not require legislative approval (*Hand v. Hospital for Special Surgery*, 2012; *Roosevelt Island Residents Assoc. v. Roosevelt Island Operation Corp.*, 2005). In addition, construction projects of less than 1 year generally do not constitute alienations, particularly when park uses can continue to go on around the construction (*Hand v. Hospital for Special Surgery*, 2012; *Powell v. City of New York*, 2011).

As discussed above, the AIM Project would cross the Blue Mountain Reservation, the Sylvan Glen Park Preserve, Cheesecote Mountain, and a Village Park in the Village of Buchanan. With regard to state parks or other lands owned by New York State agencies, such as the crossing in Harriman State Park, Rockland County, alienation is not triggered. New York State’s parkland law authorizes state agencies to approve easements and licenses in parkland for utilities serving a public purpose (N.Y. Parks & Hist. Pres. L. §13.06).

The AIM Project replacement pipeline would be located underground and thus would not permanently affect the use of the surface land for park purposes in the parks that would be crossed by the Project. The construction period within each individual park would be less than 1 year. Each state or local park management agency would decide whether to seek alienation for the proposed activities on their lands.

4.8.5.2 Connecticut

Ridgewood Country Club

Ridgewood Country Club is a private 18-hole golf course located on Franklin Street just north of Interstate 84 in the City of Danbury (Ridgewood Country Club, 2013). The club is owned by Ridgewood Country Club, Inc. and offers golf, recreational (tennis and swimming), and dining memberships. A pro golf shop is also located on-site as well as a banquet, patio, garden room, and grill room. The club’s season is May through September with June, July, and August being the most active months for the club. The Southeast to MLV 19 Take-up and Relay segment of the Project would border the northeastern side of the Ridgewood Country Club property and cross a small portion of it on existing right-of-way at the northern tip between Franklin Street Extension (MP 3.9) and Kohanza Street (MP 4.2). The portion of the Club property that would be crossed includes part of the golf course.

In October 2013, Algonquin met with the General Manager of the club to discuss the proposed Project and any concerns the club may have. In a letter to the Commission dated October 24, 2013, the club requested that Algonquin schedule the proposed work between October 2015 and April 2016 because this is their off-season and would cause the least interruption. Algonquin has agreed to this timeframe. Therefore, there would be no significant impacts on the Ridgewood Country Club, as temporary construction impacts would be restricted to the club’s off-season and there would be no new permanent easement.

Trumbull Cemetery

The Trumbull Cemetery is located in the Town of Lebanon and managed by the Town of Lebanon Historical Society Museum and Visitor Center. It contains many historic headstones and notable graves, including Revolutionary War Governor John Trumbull and William Williams, a signer of the Declaration of Independence (Town of Lebanon, 2014). The E-1 System Lateral Take-up and Relay segment of the AIM Project would be adjacent to the cemetery property for about 400 feet at MP 1.9.

IND201 – Bernard Vaughey

20140929-5067 FERC PDF (Unofficial) 9/26/2014 10:05:48 PM	
Bernard Vaughey 215 Broadway Verplanck, NY 10596-0277 September 25, 2014	
Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street NE, Room 1A Washington, DC 20426	
RE: Algonquin Gas Transmission, LLC, Docket No. CP 14-96-000, AIM Project PCBs and other contaminants at Hudson River HDD crossing	
Dear Secretary Bose:	
IND201-1	<p>The DEIS for the abovementioned project, Docket No, CP 14-96, does not acknowledge or attempt to address the presence of PCBs and other contaminants in the Hudson River, nor at the proposed crossing locations. This is yet another flaw of the DEIS, as currently presented. The current DEIS should be withdrawn at this point, and the process restarted if and when all outstanding issues have been properly and thoroughly addressed.</p> <p>The DEIS does not indicate that there was any attempt to do testing for PCBs and other contaminants in the Hudson River crossing area. Spectra/Algonquin does locate the bedrock elevation under the river, but I do not find any evidence that Spectra did any analysis of possible contamination in the river sediments that the pipeline will be installed/driven through. Spectra's consultant indicates that the shallow HDD installation within very soft sediments for the Hudson River crossing is similar to the NJ-NY Expansion project. Have they reviewed that soft sediment?</p> <p>The Hudson River has a history of contamination, but I do not find any reference to this history in the DEIS. Various project documents provide us with many observations and determinations about the nature of the sediments, such as that the river bottom sediments are very soft, based upon a soils classification system and the unconsolidated soil layer ranges from 20 to 65 feet below the river bottom. Documents indicate direct samples of the unconsolidated soils could not be collected, but also say the material is believed to consist of organics, silts and clays. What the documents do not address is what chemicals, if any, are in those soils that Spectra could not/did not collect for sampling in the path this pipe will follow?</p>

IND201-1

See the response to comment LA23-27. Utilizing the HDD method avoids disturbance to river-bottom sediments, as all subsurface materials removed along the drill path during the drilling process is removed from the borehole and contained within temporary lined mud pits. Contamination is not expected to be encountered during HDD activities; however, due to the historic presence of PCBs in the area, we are recommending that all subsurface materials recovered from the Hudson River HDD process be appropriately sampled for PCBs prior to disposal of the material (see section 4.2.2.6 of the EIS, which has been revised).

IND201 – Bernard Vaughey (cont'd)

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IND201-1
(cont'd)

The DEIS does not make clear whether Spectra/Algonquin took into account the previous uses for these landfall areas, something that FERC should have already reviewed. For many years, the West side of the Hudson River was home to a WWII Liberty Ship ghost fleet, and the corresponding draft they required. What was the depth of the Hudson, on the West side project area, 50 or 100 years ago, before the existing bulkhead was built and backfilled? How much has that area silted over in recent years, to give us the current river bottom elevation that Spectra/Algonquin is using as a reference point? What, if any, are the related PCB's and other materials that might be found at that old river level... and lower? I did not find any discussion or mention of this issue in the DEIS.

In Verplanck, the end of 9th Street on the East side of the Hudson River has been the site for many different industries since the early 1900's, including brickyards and a stone quarry, to mention just two. How much, if any, of that area at water's edge was filled - *unregulated*- by those industries, and others, during the 1900's - and with what materials? This is an unknown. The area close to the end of 9th Street was once the site of a thriving quarry operation, with related barge activity of the end of 9th St. Did Spectra/Algonquin explore what was the bottom elevation of the river along the shore 75 or 100 years ago? **There appears to be an unusual depression in the very soft clays layer, as shown on the Conceptual HDD Plan and Profile, page 824 of the DEIS.** Are there deposits of PCBs or other toxins between that level, and the current level? The river may have silted in over the years. Is the shape of the various material layers at this location, as shown on the AIM drawings, due to a natural formation, or was it due to previous activities on the site? Shouldn't Spectra/Algonquin should be testing their proposed alignment to obtain these answers, and more, **BEFORE** the project is considered for approval, much less started, to facilitate a full environmental evaluation.

The DEIS for AIM indicates Spectra/Algonquin conducted a review of each of the planned HDD entry and exit locations and found no documented soil or groundwater contamination. Of concern is that the DEIS does not address the area *between* those points – meaning the actual Hudson River bed and both landfall areas. **Why?** Without material samples, and comprehensive testing of that material, how does anyone know that PCBs and other contaminants are not present now, or have not migrated through layers over the years? Another energy project, from West Point Partners (WPP), is currently before the New York State Public Service Commission. Documents indicate that Spectra/Algonquin and WPP have had discussions about the possible co-existence of their respective proposed projects. In submitting their proposal, WPP did conduct Hudson River sampling. Some of the WPP documents are attached. Please note that **three of the WPP samples**, taken near their proposed southern cofferdam/ dredge landfall location - which is in close proximity to the AIM/ Spectra landfall - **show PCB contaminant concentrations representative of Class B sediment (100-1000 ug/kg).**

IND201 – Bernard Vaughey (cont'd)

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IND201-1
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3) All references to the entry and exit points should also include stationing and/or mileposts for reference and clarity. In the filings, the HDD exit point has been shown in at least two different locations. Originally it was along the river, at MP 3.9 +/- . The HDD exit point, now shown at Station 44+00, on Page 824 of the DEIS, is at an elevation above existing homes. Which exit point was used for the reports and evaluations?

Additionally, more specific information should be provided for the HDD entry / exit where Spectra/Algonquin indicates they will be installing casings to a depth of 90 feet. Given the elevation of the entry/exit at Station 44+00 of approx. + 50 ft +/-, the casings would be driven at a very flat angle into the river approximately 300 to 400 feet offshore, to reach an elevation of -40 +/- . The entire casing operation, and its implications, are not described in the DEIS.

Why not? These casings are of similar diameter to the piles being placed in the construction of the new Tappan Zee Bridge. The casings for the proposed Spectra/Algonquin project may equal multiple pile lengths of what is being placed for the new Tappan Zee. That new Tappan Zee Bridge project has VERY stringent noise and environmental regulations. Will similar regulations be imposed on the Spectra AIM project?


What will Spectra/Algonquin find in the soils into which the massive casings are driven? Will Spectra/Algonquin test the materials they are removing from the casings for contamination as it is excavated to determine the proper care and handling before it is disposed?

There are unaddressed issues regarding waste from the HDD, and its disposal. Much of the waste, solid and liquid, will be disposed of at still undisclosed specific locations. With the potential for PCBs, lead and other metals in the river sediment, will any of this waste be disposed of on the quarry property, an upland area, or in the Hudson Valley watershed? As indicated above, the quarry property is largely waste stone dust from the quarry operations that ceased over 50 years ago. This property is a high point in the community. The runoff from any material placed or disposed of on this property has the potential to run into the quarry, or into the river, without any treatment. This needs to be addressed, and public comment permitted, before the Draft EIS can even be considered for approval.

Another issue - although reference documents for this project indicate that HDD plans should have contingency plans, I was not able to find any in the DEIS documents for the Hudson River crossing. As part of the discussion for the Northern crossing, DEIS, section 3.5.1 states:

The probability of drill failure is significantly higher for the alternative route. If this were to occur, multiple attempts at the HDD or an alternative crossing method (such as the open cut method) could be required, which would increase the time required to complete the crossing and/or result in additional impacts on the environment.

IND201 – Bernard Vaughey (cont'd)

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IND201-1 (cont'd)	<p>While unlikely, and undesirable, if an open cut is even a remote possibility, due to the PCBs and other contaminants in the river sediment, and the project's location to Haverstraw Bay, this s needs to be addressed as part of the DEIS. If that statement was in error, and an open cut would never be considered, that also needs to be addressed.</p> <p>With regard to Unexpected Contamination Encounter Procedures, where can these procedures be found to be reviewed? There is historical contamination of the Hudson River. FERC needs to address this, and not assume it will be addressed by a procedure for unexpected encounters. The HDD crossing of the river is slated to be one of the first operations. Why is FERC allowing the possibility of all work to be stopped, for something that can be researched and planned for during the DEIS period? If PCBs or other contaminants were to be found in the river crossing, would this just follow the established procedure and be handled in house, or would there be a public notification, review and comment of the mitigation measures proposed?</p>
IND201-2	<p>A request for FERC to provide an expedited approval is not reasonable under these circumstances. There are far too many serious questions, omissions, and key issues to be addressed. Please withdraw the current DEIS from further review. If and when ALL outstanding issues have been addressed, a Supplemental Draft Environmental Impact Statement (SDEIS) can then be published, with standard, rather than expedited, review, and new public hearings.</p> <p>Thank you,</p>  <p>Bernard Vaughey</p> <p>cc:</p> <p>Senator Charles Schumer Senator Kirsten Gillibrand Assemblywoman Sandy Galef Supervisor Linda Puglisi Mayor Theresa Knickerbocker Daniel Riesel, Esq.</p>

IND201-2

See the responses to comments FA4-1, FA6-5, SA1-12, and SA2-10.

IND201 – Bernard Vaughey (cont'd)

The attachments to this letter are too voluminous to include in this EIS. They are available for viewing on the FERC website at <http://www.ferc.gov>. Using the "eLibrary" link, select "General Search" from the eLibrary menu, enter the selected date range and "Docket No." excluding the last three digits (i.e., CP14-96-000), and follow the instructions. For assistance please contact FERC Online Support at FERCOnlineSupport@ferc.gov or toll free at 1-866-208-3676, or for TTY, contact 202-502-8659. The Category/Accession number for this submittal is 20140929-5067.

IND202 – Bernard Vaughey

	<p style="text-align: right;">Bernard Vaughey 215 Broadway Verplanck, NY 10596-0277 September 26, 2014</p> <p>Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street NE, Room 1A Washington, DC 20426</p> <p style="text-align: center;">RE: Algonquin Gas Transmission, LLC, Docket No. CP 14-96, AIM project Deficiencies in Review of Maintenance and Protection of Traffic</p> <p>Dear Secretary Bose:</p>
IND202-1	<p>The Maintenance and Protection of Traffic (MP&T) details shown in the DEIS are deficient and incomplete. FERC staff's recommendation to submit revised Traffic Management plans with the Director of OEP prior to construction in New York is UNACCEPTABLE. Site-specific traffic control plans, including important information currently missing, needs to be submitted as part of the initial publication of the DEIS, similar to what was detailed for other states in the DEIS.</p>
IND202-2	<p>The currently circulating DEIS should be immediately withdrawn or rejected, and the entire process should be restarted, but only after all the missing components, and the newly requested reports and assessments have been properly prepared, properly portrayed, reviewed and publicly commented upon. Only then should a Supplemental Draft Environmental Impact Statement be published, with a STANDARD, rather than an expedited review period for comments.</p>
IND202-3	<p>Spectra wants to get the permitting done FAST. The People of the State of New York expect FERC to get the permitting process done RIGHT and CORRECTLY.</p>
IND202-4	<p>Has anyone at FERC with a background in traffic control, reviewed these MP&T details for actual constructability, in the locations they are to be applied? Did the person reviewing these documents have a traffic and construction background?</p> <p>I have a number of constructability questions: Many of these proposed crossings are perpendicular to the flow of traffic. Accordingly, the excavation equipment will need to operate perpendicular to traffic, and may need to be positioned outside the patterns shown. Was this factor considered? Were the width and depth of the cuts considered? Width and depth may affect the size of the equipment required?</p> <p>The Traffic Control plans are deficient. Some of the Plates in section G refer to the Manual of Uniform Traffic Control Devices, NYSDOT Standard Specification, and other documents as well. Are these manuals and/or documents part of this project? If so, how are they brought into</p>
	<p style="text-align: center;">Page 1 of 4</p>

- IND202-1 Transportation and traffic-related impacts associated with the construction of the New York pipeline segments, including traffic management strategies, are described in section 4.9.5.1 and appendix G of the EIS. Algonquin continues to refine the site-specific traffic management plans provided in appendix G of the EIS pursuant to input from the affected municipalities. See also the response to comment FA4-1.
- IND202-2 See the responses to comments FA4-1, SA1-12, and SA2-10.
- IND202-3 See the responses to comments SA2-10 and FL7-4.
- IND202-4 Road crossings (i.e., construction perpendicular to the road) are a common occurrence in natural gas pipeline siting. Section 2.3.1.2 of the EIS describes the construction methodology for road crossings. The Route 9A crossing in Buchanan is one of the crossings listed in the Traffic Management Plan for the New York Pipeline Segments as needing further site-specific details. Therefore, we have recommended that Algonquin file a revised traffic management plan prior to construction that includes the site-specific details for this crossing. The EIS also includes recommendation number 1 (section 5.2) to the Commission requiring Algonquin to follow the commitments made in its application and supplements. With the exception of portions of the Project along the West Roxbury Lateral where nighttime construction is proposed to minimize traffic-related impacts, most construction would occur during daytime hours. Section 1.3 of the EIS identifies all of the federal, state, and local permits or consultations for the Project. Section 4.11.3 of the EIS identifies the noise regulations and compliance with these regulations. While we encourage the applicant to obtain and comply with state and local permits/regulations, if the project is approved by the Commission, these permits/regulations cannot unreasonably delay construction of the Project. As discussed in section 4.8.3.1 of the EIS, access to homes and businesses would be maintained at all times during construction. Traffic control signage would be installed in accordance with the Traffic Management Plan for the New York Pipeline Segments and applicable state and local requirements. See also the responses to comments FA4-1, SA1-12, SA2-10, and IND202-1.

IND202 – Bernard Vaughey (cont'd)

IND202-4
(cont'd)

the project document, so that compliance would be **required**, rather than optional? Simply mentioning or referring to a document normally is not sufficient to make these sources a contract binding source document.

Many operational issues, such as sign-mounting devices, height of mounting, size of signs, reflectivity of signs, lighting, night time lighting, or signs and work zones, are defined in the NYSDOT documents. How are those issues brought into and made binding in the AIM project if they are not specifically detailed in the project documents or DEIS?

When an agency or organization borrows documents from another group, it is important for those source documents to be properly incorporated into that new document and/or contract, so that no conflicts arise from the source documents use. **This has to be done on many levels.** A few examples include issues with clarification of definitions and titles. Where does one find: "level II illumination" defined? Where does one find the definition for "night time operations"? One MP&T plate references "the Regional Director or his/her designee". Who would **that** be on this project? Will New York State DOT be controlling work in New York, or is it someone employed by FERC, or Spectra? That needs to be made clear from well before the start of the project. The public needs to know, and be able to comment.

Under project description, the DEIS indicates working hours between 7AM and 7PM are desirable. The DEIS also references the extent of restricted work hours, but nothing else is clarified. Under the MP&T section introduction, the DEIS indicates that this report summarizes the currently proposed schedule, **hours of operation**, and provides a representative traffic management plan. To review the traffic plan, the public needs to know **what are the time and day restrictions at each of these road crossings? Where is this information in the DEIS documents?**

There is no reference about specific advance notification for local municipalities or emergency services being required, nor if the contractor must be in compliance with local regulations, including noise restrictions, nor if the FERC published **documents overrule local rules and regulations.** That is missing and needs to be addressed for a proper review.

The traffic drawings presented in the DEIS appear to all be marked preliminary, for review. We expect to see final drawings as part of the DEIS process, so that we can comment on those drawings during the DEIS period. Submittal after the DEIS comment period, but prior to construction, should be unacceptable to the DEIS process. .

Basic traffic issues such as reflectivity requirement, and class of reflectivity of all traffic control devices, and number of stripes on cones, whether or not barrels and/ or barricades are needed or permitted, and if so, their locations, and their size, and configuration all need to be defined, but they are not in the documents provided in the DEIS.

IND202 – Bernard Vaughey (cont'd)

IND202-4
(conf'd)

The traffic control drawings / plates show what are clearly typical situations, with shoulders. There are many areas, such as the crossings at Bleakley Avenue in Buchanan and Route 9A in Peekskill, that do not have shoulders. How are the patterns to be applied, as the site-specific plans indicated in the DEIS are not present?

As part of the constructability review mentioned above, is there sufficient width on these roadways to allow the patterns shown, as well as the required overlapping of the patterns to get the work done where the two patterns meet longitudinally?

Is there sufficient width in the proposed patterns to allow the work to be performed? Is additional room needed to allow equipment to be loaded, for example, for excavation equipment to rotate without impacting traffic? At Route 9A, there are Algonquin pipeline facilities immediately behind the sidewalk on the Southbound side. The 30-inch line is to remain in use. Is this an issue?

Bleakley Avenue in Buchanan has special needs. Has any construction supervisor from Algonquin reviewed the work area and the traffic control to make sure Spectra can do their excavation, while maintaining traffic flow to Indian Point Energy Center on Bleakley Avenue?

Many of the crossings are to be open cuts. Will roadway plates be installed during non-working hours? If so, where is the plate detailing the specifics, including the signing, pinning details for the plates, thickness of plates to span the trenches, necessity for ramping or beveling of the plates due to the thickness, and all the other questions that go with this operation.

In the FERC **Conclusions**, the DEIS indicates that in response to the thoughts and concerns of these various stakeholders, Algonquin has developed site-specific traffic management plans. Could you please provide the sheet numbers in this DEIS where the site-specific traffic management plan crossing of Route 9A at the Peekskill/ Buchanan border is detailed (see Table 2, on page G-10). **Could you please indicated which, if any, stakeholders from Buchanan, Peekskill, or local various emergency services that were involved in that plan's formulation?**

The DEIS drawings / plates for Route 9a do not appear to address the businesses lining this route, and/or required signing that may not meet the typical details, when the length of the work zone, buffers, tapers and signing distances are considered. Egress from businesses and the entrance ramp to a state highway may be impacted, possibly within buffers or tapers. **Where is that in the DEIS-referenced site-specific plans?** Route 9A is a 4-lane divided state highway with a median in places. Is median signing required, or suggested, for visibility, or to meet unusual alignment issues? On Southbound Route 9A, a local city street named South Street, will enter the buffer and work zone at an angle. Will this traffic movement be allowed, or will traffic need to be detoured? Has the detour been discussed with the appropriate stakeholders and has detour route signing been included in the site-specific traffic management plan referenced in the DEIS? Please provide details.

IND202 – Bernard Vaughey (cont'd)

IND202-4
(cont'd)

Hopefully the missing site-specific traffic plans will address how to properly provide required advance signing for a left lane closure, Southbound Route 9A, thru the left turn lane for the ramp to Route 9.

These comments, while mainly about one location, may apply to other locations. This traffic management plan needs more details, much like those provided for other states in the DEIS.

Please complete the New York traffic management plan and republish, so that comments can be included before the end of the comment period for the DEIS.

FERC's effort to provide an expedited approval is not reasonable under these circumstances. There are far too many serious questions, omissions, and key issues to be addressed. Please withdraw the current DEIS from further review. If and when ALL outstanding issues have been addressed, a Supplemental Draft Environmental Impact Statement (SDEIS) could then be published, with standard, rather than expedited, review, and new public hearings.

Thank you,



Bernard Vaughey

Cc:

Supervisor Linda Puglisi
Mayor Frank Catalina
Mayor Theresa Knickerbocker
Daniel Riesel, Esq.

IND202 – Bernard Vaughey (cont'd)

20140806-4001 FERC PDF (Unofficial) 08/06/2014



2.0 PROJECT DESCRIPTION

The projected in-service date of the AIM Project is November 2016. Construction of the Project pipeline facilities, new M&R stations, and modifications to the Algonquin's existing compressor stations and M&R stations is expected to occur over a 1½ year period to accommodate multiple work locations and the need for scheduled system outages for the numerous tie-ins along the existing system. The work is scheduled to start in the 1st Quarter of 2015 and be completed by October 2016.

Table 2-1 provides a preliminary construction schedule.

TABLE 2-1 Preliminary Construction Schedule for AIM Project Facilities in New York			
Facilities	Start	Finish	Length (miles)
PIPELINE FACILITIES			
Mainline Take-up & Relay a/	March 2016	Oct. 2016	12.8
Horizontal Directional Drill/New Pipe b/ Hudson River	March 2015	Oct. 2015	2.9
ABOVEGROUND FACILITIES			
<u>Existing Compressor Station Modifications</u>			
Stony Point c/	March 2016	Oct. 2016	N/A
Southeast c/	March 2016	Oct. 2016	N/A
<u>Existing M&R Station Modifications</u>			
Stony Point M&R Station	April 2016	Oct. 2016	N/A
Peekskill M&R Station	April 2015	Oct. 2015	N/A
Cortlandt M&R Station	April 2016	Oct. 2016	N/A
Notes:			
a/ Certain complex pipeline crossings (e.g., road, streams, railroads) may be constructed during the April – October 2015 construction season. Winter clearing in Nov. 2015 – Feb. 2016 may be necessary to address time of year restrictions.			
b/ The length shown for the Hudson River HDD is also included in the total length shown for the mainline take-up and relay.			
c/ Civil site work at these two compressor stations will begin in the April – October 2015 time frame.			

To expedite the completion of the Project, weekday working hours between 7 AM and 7 PM are desirable. However, Algonquin recognizes that these hours may not be possible for all portions of the Project due to traffic management in consideration of abutting residential and commercial properties, and that night working hours may be required. The exact timeframe for the completion of the Project is dependent on weather conditions, extent of restricted work hours and other factors. For construction planning purposes, the Project is being viewed in eighteen distinct sections. To minimize the duration of construction, work may occur simultaneously in multiple areas as three dedicated construction crews are expected to be working on the Project. For each portion of the Project involving work in public roadways traffic management plans will be required to help ensure general public safety and to maintain appropriate traffic flow. In addition to measures to address motor vehicles, considerations also will be made for pedestrians, bicycles, and construction workers. As such, Algonquin will continue to work closely with the various municipalities and public agencies involved, as well as residential and commercial stakeholders that may be affected by the Project.

IND202 – Bernard Vaughey (cont'd)

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3.0 REPRESENTATIVE TRAFFIC MANAGEMENT PLANS

General traffic management plans have been developed and included as part of this TMP. The plans were developed following standards contained in the Manual on Uniform Traffic Control Devices (MUTCD)², New York State Supplement to the Manual on Uniform Traffic Control Devices, and the New York State Work Zone Traffic Control Standard Details. While not all of the affected roadways are under New York State Department of Transportation ("NYSDOT") jurisdiction, NYSDOT's "Work Zone Traffic Control Standard Details" also were applied to local and residential roadways. These resulting plans are expected to be implemented for the majority of the work areas. The following tables provide a summary of where the attached traffic management plans are applied at each road crossing along the project.

A meeting with the NYSDOT was held on April 14, 2014 to discuss the locations and crossing methods of the proposed AIM Pipeline installations across NYSDOT jurisdictional roadways. The purpose of the meeting was to introduce the AIM Project, discuss pipeline crossing methods, required geotechnical boring work, and license vs. easement options pertaining to pipeline occupation at the road crossings.

The TMP's outlined in this document are being provided to each of the affected municipalities crossed by the proposed AIM Project and will be part of continuing communications.

Table 1: New York Roadways Affected by Construction (Haverstraw to Stony Point)

	MP	Road Name	Road Surface	Proposed Crossing Method	County	Municipality	Typical Detail #
Mainline Take up and Relay (Haverstraw to Stony Point)	0.3	Call Hollow Rd.	Paved	Open Cut	Rockland	Haverstraw	TTC DETAILS #1 AND #6
	0.49	Wolf Rd.	Paved	Open Cut	Rockland	Haverstraw	TTC DETAILS #1 AND #6
	1.02	Call Hollow Rd.	Paved	Open Cut	Rockland	Haverstraw	TTC DETAILS #1 AND #6
	1.18	Willow Grove Rd.	Paved	Open Cut	Rockland	Stony Point	TTC DETAILS #1 AND #6
	2.28	Pierce Dr.	Paved	Open Cut	Rockland	Stony Point	TTC DETAILS #5 AND #6
	2.39	Zachary Taylor St.	Paved	Open Cut	Rockland	Stony Point	SITE SPECIFIC DETAIL REQUIRED - MODIFICATION OF TTC DETAILS #1 AND #6
	2.46	Pyngyp Rd.	Paved	Open Cut	Rockland	Stony Point	TTC DETAILS #1 AND #6
	2.97	Gate Hill Rd. (HWY .210)	Paved	Open Cut	Rockland	Stony Point	SITE SPECIFIC DETAIL REQUIRED - MODIFICATION OF TTC DETAILS #1 AND #6
	3	Cedar Flats Rd.	Paved	Open Cut	Rockland	Stony Point	TTC DETAILS #1 AND #6

² U.S. Department of Transportation Federal Highway Administration, Manual on Uniform Traffic Control Devices, 2009 Edition; Washington DC, December 2009.

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IND202 – Bernard Vaughey (cont'd)

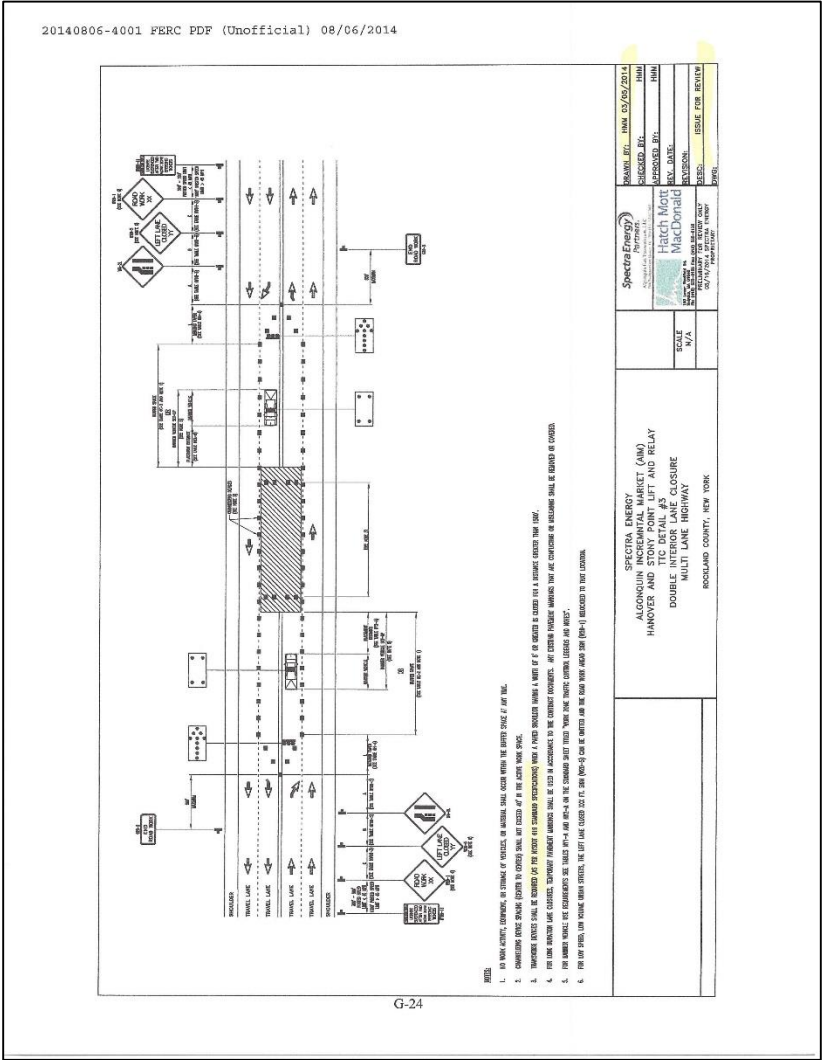
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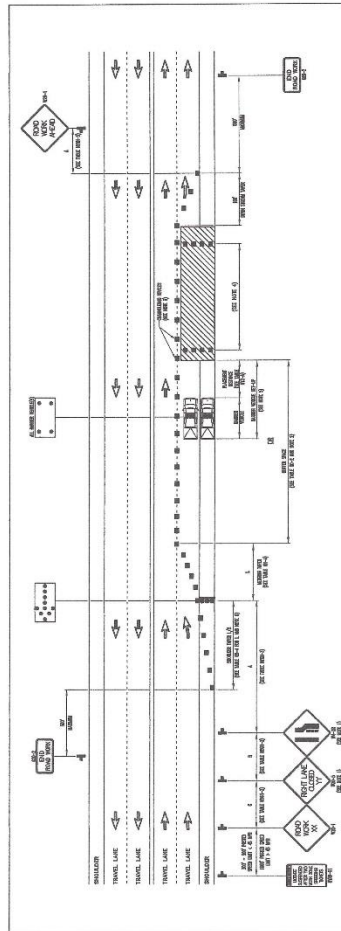
Table 2: New York Roadways Affected by Construction (Stony Point to Yorktown)

MP	Road Name	Road Surface	Proposed Crossing Method	County	Municipality	Typical Detail #
0.44	Bulson Town Rd (Rte 65)	Paved	Open Cut	Rockland	Stony Point	TTC DETAILS #1 AND #6
0.7	Franck Rd.	Paved	Open Cut	Rockland	Stony Point	TTC DETAILS #1 AND #6
1.38	Soluri Ln.	Paved	Open Cut	Rockland	Stony Point	TTC DETAILS #5 AND #6
1.64	Soluri Ln.	Paved	Open Cut	Rockland	Stony Point	TTC DETAILS #5 AND #6
2.14	Rte. 53/Buck Berg Mountain Rd.	Paved	Open Cut	Rockland	Stony Point	TTC DETAILS #1 AND #6
2.38	Mott Farm Rd. (Rte. 118)	Paved	Open Cut	Rockland	Stony Point	TTC DETAILS #1 AND #6
2.95	Highway 9	Paved	Open Cut	Rockland	Stony Point	TTC DETAILS #1 AND #6
2.97	West Shore Dr.	Paved	Open Cut	Rockland	Stony Point	TTC DETAILS #1 AND #6
4.5	Lafarge Entrance Rd.	Paved	Open Cut	Westchester	Cortlandt	TTC DETAILS #1 AND #6
4.77	Broadway	Paved	Bore	Westchester	Cortlandt	TTC DETAIL # 6
5.52	Bleakley Ave.	Paved	Open Cut	Westchester	Cortlandt	SITE SPECIFIC DETAIL REQUIRED - MODIFICATION OF TTC DETAILS #1, # 4 AND #6
5.76	Rte. 9A	Paved	Open Cut	Westchester	Cortlandt	SITE SPECIFIC DETAIL REQUIRED - MODIFICATION OF TTC DETAILS #2, #3, #4 AND #6
5.87	Reynolds Hills	Paved	Bore	Westchester	Cortlandt	TTC DETAIL # 6
6.31	Pine Ln.	Paved	Open Cut	Westchester	Cortlandt	TTC DETAILS #1 AND #6
6.42	Boulder Dr.	Paved	Open Cut	Westchester	Cortlandt	TTC DETAILS #1 AND #6
6.68	Washington St.	Paved	Open Cut	Westchester	Cortlandt	TTC DETAILS #1 AND #6
8.43	Montrose Station Rd.	Paved	Open Cut	Westchester	Cortlandt	SITE SPECIFIC DETAIL REQUIRED - MODIFICATION OF TTC DETAILS #1 AND #6
8.43	Maple Ave.	Paved	Open Cut	Westchester	Cortlandt	SITE SPECIFIC DETAIL REQUIRED - MODIFICATION OF TTC DETAILS #1 AND #6
9.05	Benjamin Ln.	Paved	Open Cut	Westchester	Cortlandt	TTC DETAILS #5 AND #6
9.21	Dimond Ave.	Paved	Open Cut	Westchester	Cortlandt	TTC DETAILS #5 AND #6

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IND202 – Bernard Vaughey (cont'd)



G-23

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<p>SPECTRA ENERGY ALCONQUIN INCREMENTAL MARKET (AM) HANDOVER AND STORY POINT UFT AND RELAY TTC CABLE #2 SINGLE LANE CLOSURE SHORT OR INTERMEDIATE TERM STATIONARY MULTI LANE HIGHWAY (UNDIVIDED)</p>	<p>SCALE 1/4"</p>	<p>Spectra Energy Partners A Division of Spectra Energy Group, Inc.  Hatch Mott MacDonald 10000 North Central Expressway, Suite 100 Dallas, Texas 75243 Tel: 972.960.8000 Fax: 972.960.8001 Email: info@hatchmott.com</p>	<p>DESIGN BY: HMM 02/07/2014 CHECKED BY: HMM APPROVED BY: HMM DATE: 02/07/2014 REVISION: ISSUE FOR REVIEW 0002</p>
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IND202 – Bernard Vaughey (cont'd)

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- b. a description of the construction activities that would occur adjacent to the site;
 - c. the timing of construction activities (i.e., months of the year, days of the week, and hours of the day);
 - d. details on the timing of construction relative to scheduled games (for Dodd Stadium);
 - e. a description of the construction methods that would be used (for Gonzalez Field);
 - f. specific measures that would be implemented to minimize conflicts and impacts on the users of these facilities (for Dodd Stadium, particularly when games are in progress); and
 - g. documentation of consultation with officials from each facility. (*Sections 4.8.5.1, 4.8.5.2, and 4.8.5.3*)
30. **Prior to the end of the draft EIS comment period**, Algonquin shall file with the Secretary the proposed construction schedule for the Norfolk Golf Club that would minimize impacts on use of the club, any other measures developed in consultation with the club owners to minimize impacts on the golf course during construction, and documentation of consultation with the club owners. (*Section 4.8.5.3*)
31. **Prior to the end of the draft EIS comment period**, Algonquin shall file with the Secretary the results of consultations with National Grid and details of any route variations agreed upon in order to relocate the interconnection from St. Theresa Avenue to avoid or minimize impacts on St. Theresa of Avila School and Parish. If the pipeline is not relocated, then Algonquin shall file with the Secretary a site-specific construction plan for St. Theresa of Avila School and Parish. The plan shall be developed with the parish leadership and include:
- a. details on the location of the school and parish facilities relative to the proposed construction activities;
 - b. a description of the construction activities that would occur at the site;
 - c. the timing of construction activities (i.e., days of the week and hours of the day);
 - d. specific measures that would be implemented to minimize conflicts with the school and parish; and
 - e. documentation of consultation with the parish leadership. (*Section 4.8.5.3*)
32. **Prior to construction in New York**, Algonquin shall file with the Secretary, for review and written approval of the Director of OEP, a revised Traffic Management Plan for the New York Pipeline Segments that includes the site-specific details for the crossings of Zachary Taylor Street, Gate Hill Road (Highway 210), Bleakley Avenue, Route 9A, Montrose Station Road, Maple Avenue, and Cordwood Road. (*Section 4.9.5.1*)
33. **Prior to the end of the draft EIS comment period**, Algonquin shall file with the Secretary a revised Procedures Guiding the Discovery of Unanticipated Cultural Resources and Human Remains that incorporates the Connecticut SHPO's comment to include specific language of CGS section 10-388. (*Section 4.10.4*)

IND-350



IND202 – Bernard Vaughey (cont'd)

20140806-4001 FERC PDF (Unofficial) 08/06/2014



1.0 INTRODUCTION

Algonquin Gas Transmission, LLC ("Algonquin"), an indirect, wholly-owned subsidiary of Spectra Energy Partners, L.P., is seeking authorization from the Federal Energy Regulatory Commission ("FERC" or "Commission") pursuant to Section 7(c) of the Natural Gas Act¹ ("NGA") to construct, install, own, operate, and maintain the Algonquin Incremental Market Project ("AIM Project" or "Project") which will involve expansion of its existing pipeline systems located in New York, Connecticut, Rhode Island and Massachusetts.

In New York, Algonquin will take-up and relay approximately 3.3-miles of mainline pipeline located upstream (southwest) of the existing Stony Point Compressor Station in Rockland County, New York (*Haverstraw to Stony Point Take-up & Relay*). The installation of the new 42-inch pipeline will begin at the existing Algonquin Mainline Valve Site ("MLV") 13B (MP 0.0) located west of Call Hollow Road in the Town of Haverstraw and end at the Stony Point Compressor Station located northeast of Cedar Flats Road in the Town of Stony Point (MP 3.3).

Downstream (northeast) of the Stony Point Compressor Station, Algonquin will construct approximately 12.3 miles of 42-inch diameter mainline pipeline in the Towns of Stony Point and Cortlandt (including the Hamlet of Verplanck and the Village of Buchanan), the City of Peekskill, and the Town of Yorktown (*Stony Point to Yorktown Take-up & Relay*). This pipeline section includes two segments of take-up and relay pipeline construction and one section of pipeline construction within a new permanent ROW across the Hudson River.

In response to comments from the FERC, landowners and other stakeholders, Algonquin has retained Hatch Mott MacDonald, NY LLC, ("HMM") to provide traffic engineering consulting services in support of the proposed Project facilities in New York. Algonquin is committed to working with each municipality along the Project limits to address potential transportation-related impacts associated with constructing the proposed pipeline. This document includes a summary of roadways where the construction will take place and information regarding general traffic management strategies. Based on the research conducted to date, **this report summarizes the currently proposed construction schedule, hours of operation**, and provides representative traffic management plans that will be implemented during construction.

¹ 15 U.S.C. § 717(f) (2006).

IND202 – Bernard Vaughey (cont'd)

20140806-4001 FERC PDF (Unofficial) 08/06/2014



6.0 CONCLUSION

Algonquin has undertaken an extensive process of evaluating the traffic management measures which will be required during construction of the Project. To date, this effort has involved compiling available traffic count data and performing new traffic counts in the vicinity of the Project. The intent of this effort was to quantify existing traffic conditions, review notable traffic patterns, and to use this information to help identify appropriate working hours. Beyond the standard traffic data analysis, Algonquin also has taken the context of the surrounding area into consideration to help minimize any disruptions or impacts to nearby residences, businesses or schools. In doing so there has been an extensive ongoing community outreach and continued coordination efforts with the various municipalities and agencies involved with the Project.

In response to the thoughts and concerns of these various stakeholders, Algonquin has developed site-specific traffic management plans that will be implemented along the Project corridor. The general traffic management principles depicted on the attached plans are expected to be carried through for each portion of the Project to help minimize any disruptions to traffic operations in the area.

IND203 – Rebecca Shamson

20140929-5078 FERC PDF (Unofficial) 9/29/2014 8:48:57 AM

IND203-1 | Rebecca Shamson, Kerhonkson, NY.
Taxpayers and victims of any accidents should NOT be subsidizing a pipeline that is primarily designed to facilitate the export of gas via dangerous LNG terminals

IND203-2 | The money wasted on this insane project and the associate fracking is better spent on energy conservation and renewable energy!

IND203-3 | Approving this line will put this country further along a dead end path.

IND203-1 | See the responses to comments CO15-4 and IND102-3.

IND203-2 | See the response to comment FL4-11.

IND203-3 | Comment noted.

IND204 – Paul Blanch

20140929-5080 FERC PDF (Unofficial) 9/29/2014 8:24:38 AM

Paul M. Blanch
Energy Consultant

September 27, 2014

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Subject:
Algonquin Gas Transmission, LLC
Docket No. CP14-96-000
FERC/EIS-0254D

Dear Ms. Bose

IND204-1 I am submitting the following comments on behalf of myself on the above-proposed project. I am a registered Professional Engineer with more than 45 years of Nuclear safety, engineering operation and Federal regulatory requirements.

I have been a consultant to the Chief Nuclear Officers at Indian Point and also an expert witness for the Attorney General for the State of New York related to the relicensing efforts of Indian point.

In October 2010¹ I petitioned² the Nuclear Regulatory Commission (NRC) to evaluate the risks associated with the existing gas lines. The NRC in its response stated this analysis had been conducted however they would not share it with me due to national security concerns.

I have conducted a detailed review of the Draft Environmental Impact Statement (DEIS) and the requirements as stated in 49 CFR 192 “Transportation of natural and other gas by pipeline: Minimum federal safety standards” and also 30 CFR Part 380, Appendix A to Part 380 – “Minimum Filing Requirements for Environmental Reports Under the Natural Gas Act.”

¹ <http://pbadupws.nrc.gov/docs/ML1030/ML103020293.pdf>

² <http://www.huffingtonpost.com/huff-wires/20101025/us-indian-point-gas-line/>

IND204-1

We assume that the commentor has incorrectly referenced the Minimum Filing Requirements for Environmental Reports Under the Natural Gas Act in 18 CFR Part 380. The referenced 18 CFR 380.12(m) refers to the minimum filing requirements for reliability and safety applicable to liquefied natural gas facilities, and does not apply to this Project. However, the EIS includes a detailed discussion of reliability and safety in section 4.12. The design of the pipeline must meet the DOT safety standards in 49 CFR Part 192. DOT is the agency responsible for enforcing compliance with its regulations. See also the responses to comments FA4-25, SA4-5, SA7-4, SA14-11, and LA2-6.

IND204 – Paul Blanch (cont'd)

EVALUATION OF FEDERAL (UNCLASSIFIED) 2/27/2014 0:47:30 PM	
- 2 - September 27, 2014	
IND204-1 (cont'd)	<p>Based upon these Federal requirements I have the following comments related to the DEIS and the Spectra application:</p> <p>1. 30 CFR 380 (m), Reliability and Safety explicitly states:</p> <p><i>"Describe how the project facilities would be designed, constructed, operated, and maintained to minimize potential hazard to the public from the failure of project components as a result of accidents or natural catastrophes. (§ 380.12(m))."</i></p> <p>This proposed line is located in the vicinity of residents, schools, churches and one of the largest nuclear plants in the USA. 49 CFR 192 discusses various design requirements for safety. I note that the new lines are not designed to the most stringent safety requirements of Class 4 lines. Contrary to these requirements I did not see any discussion within the DEIS or the application discussing what provisions would be incorporated to minimize the impact to the public and why these lines are not designed to the maximum safety standards specified by 49 CFR 192.111 and 49 CFR 192.5. These standards would require closer isolation valve spacing, and more robust pipes designed to withstand higher pressures. While not a specific requirement to design these lines as Class 4, it was never anticipated that gas transmission lines would be located near or on the property of a nuclear power facility.</p> <p>There is no discussion in either the AIM proposed description or the DEIS as to automatic isolation valves which had been removed from the original gas lines. The only isolation valves are controlled from Houston, Texas and there is no assurance these will be operable due to an earthquake or other natural disaster.</p> <p>2. The White Plains Journal News published the following Community View on September 15, 2014. Some of these may be new issues however none of these issues have been addressed in either the DEIS or the Spectra Application.</p> <p><i>"View: Algonquin plan poses risks to Indian Point, residents"</i></p>
2	

IND204 – Paul Blanch (cont'd)

60470262-0000 FBNL FNF (UNCLASSIFIED) 2/62/6047 0:49:30 PM	– 3 – September 27, 2014
IND204-1 (cont'd)	<p><i>Paul Blanch 10 p.m. EDT September 14, 2014 Spectra plans to place a larger gas pipeline near Indian Point. The probability of a gas line failure is remote but is not zero. It is unconscionable and irresponsible to continue this project prior to a complete, independent risk analysis.</i></p> <p><i>Nuclear power plants and natural gas transmission lines provide energy for homes and businesses. Due to the inherent hazards associated with these energy sources, the federal government "regulates" both. The proposed routing of the Algonquin natural gas pipeline near the Indian Point nuclear plant poses the risk that these hazards may team up to harm the community.</i></p> <p><i>I speak as a professional engineer with more than 45 years of nuclear experience including formerly reporting directly to the Chief Nuclear Officer at Indian Point and an expert witness for the State of New York related to the relicensing of Indian Point.</i></p> <p><i>There are three gas existing natural gas transmission lines traversing the Indian Point site within 600 feet of vital structures. There has not been any publicly available analysis demonstrating the risks of these lines. The Nuclear Regulatory Commission has refused to provide this information under the guise of national security, yet has maintained the "secret" analysis shows Indian Point is not at undue risk.</i></p> <p><i>Failure of any of these lines could result in a total loss of cooling to the reactor cores and 40 years inventory of spent fuel. There are no provisions within the area to combat this event until valves are remotely closed from the pipeline company's facility in Houston, Texas. In the meantime, the energy released from a ruptured line in one hour would exceed the energy released from one of the atomic bombs dropped on Japan in 1945.</i></p> <p><i>Some of the possible consequences of a gas line fire/explosion to Indian Point include loss of power to the entire site, secondary fires from liquid fuel storage tanks, reactor core damage and melting, asphyxiation of site personnel, spent fuel radioactivity releases exceeding those of Fukushima, and social/economic damages exceeding \$1 trillion.</i></p> <p><i>Now Algonquin/Spectra wants to place yet another high-pressure 42-inch line also in the vicinity of Indian Point, doubling the existing</i></p>
3	

IND204 – Paul Blanch (cont'd)

IND204-1 (cont'd)	<p>capacity. According to the Federal Energy Regulatory Commission, "the proposed route would not pose any new hazard to the (Indian Point) facility." There is no way FERC could make this determination without a complete risk analysis. And FERC's Draft Environmental Impact Statement ignores damage prevention, emergency response and public awareness, which are federal Department of Transportation requirements.</p> <p><u>Algonquin gas pipeline project sparks safety concerns</u></p> <p>An independent study of a gas pipeline near a nuclear facility in another state concluded it represented an undue risk. The amount of gas flow and energy in that pipeline was less than 1/1000 of the Algonquin/Spectra project and the facility was located in an area with much lower population.</p> <p>The probability of a gas line failure is remote but is not zero especially if terrorism is considered. This may possibly be one of the most attractive targets in the nation.</p> <p>The event would be aggravated by the decision of Spectra to not include any automatic gas termination valves and no means to combat the fire/explosion prior to gas flow termination. The gas lines are not designed to the most stringent safety standards as discussed in DOT regulations. The only gas isolation valves are remotely controlled from Houston, Texas. It seems the community around Indian Point is protected against a gas pipeline rupture triggering a nuclear plant accident—unless a gas pipeline ruptures. That's unacceptable.</p> <p>The State of New York and all of the impacted counties must demand an independent and transparent analysis be conducted by an independent engineering organization. The cost for this study should be borne by Spectra/Entergy.</p> <p>It is unconscionable and irresponsible to continue this project prior to a complete, independent risk analysis. The potential consequences of this event are too devastating to the New York area and my home State of Connecticut not to design this new line to maximum safety standards and assess the risk.</p>
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IND204 – Paul Blanch (cont'd)

60470262-0000 FERC FILE (UNCLASSIFIED) 2/62/2014 0:49:30 PM	
- 5 - September 27, 2014	
IND204-1 (cont'd)	<p><i>The writer, a West Hartford, Conn., resident, is an engineer."</i></p> <p>3. 30 CFR Part 380 also requires:</p> <ul style="list-style-type: none">(1) Describe measures proposed to protect the public from failure of the proposed facilities (including coordination with local agencies).(3) Discuss design and operational measures to avoid or reduce risk.(5) Describe measures used to exclude the public from hazardous areas. Discuss measures used to minimize problems arising from malfunctions and accidents (with estimates of probability of occurrence) and identify standard procedures for protecting services and public safety during maintenance and breakdowns. <p>Again, none of these requirements met or addressed.</p> <p>4. Page ES-8 FERC DEIS states:</p> <p><i>"Algonquin identified that because of the distance of the proposed Project from the IPEC generating facilities and the avoidance and mitigation measures that it would implement, the proposed route would not pose any new safety hazards to the IPEC facility. To ensure that the ADM Project would not present new safety hazards to the IPEC facility, we are recommending that Algonquin file the final conclusions regarding any potential safety-related conflicts with the IPEC based on the Hazards Analysis performed by Entergy."</i></p> <p>This is one of the most egregious statements within the DEIS and is an irresponsible and rash statement with no bases. The Nuclear Regulatory Commission (NRC) has reviewed similar analysis at nuclear facilities nuclear facilities with 1/1000 of the proposed gas flow and located more than one mile from the facility and determined that a 16-inch operating at 50-PSI. The study</p>
5	

IND204 – Paul Blanch (cont’d)

E:\V\204-2014\IND204-1\IND204-1 (cont'd).docx	- 6 - September 27, 2014
IND204-1 (cont'd)	<p>performed by Framatome determined gas line presented undue risk to the facility. Any analysis conducted with a foregone outcome as stated within the DEIS is completely unscientific and irresponsible. It should be FERC's responsibility to assure this analysis is conducted in an open, scientific, transparent independent manner with a peer review. This analysis cannot be conducted by any organization with a vested interest such as Spectra/Algonquin, Indian Point/Entergy or the Nuclear Regulatory Commission.</p> <p>West Point Partners, LLC ("WPP") proposes to construct and operate the West Point Transmission Project ("the Project"), an approximately 80-mile-long high voltage electric transmission facility that will connect the existing National Grid Leeds Substation (Leeds Substation) in the Town of Athens, Greene County, NY, and the existing Consolidated Edison Company of New York, Inc. (Con Edison), Buchanan North Substation (Buchanan Substation) located adjacent to the Indian Point Energy Center in the Village of Buchanan, Town of Cortlandt, Westchester County, NY. For approximately 77 miles of its length, the Project will be buried under the bed of the Hudson River.</p> <p>Both the American Society of Civil Engineers³ and the National Association of Corrosion Engineers clearly state⁴ that high voltage direct current (HVDC) lines will induce "stray currents" which will accelerate the corrosion of metallic piping systems. This HVDC line will directly intersect with both the new and 60 year old degrading existing gas transmission lines and piping systems and tanks at the Indian Point facility.</p> <p>49 CFR Part 192, Appendix D to Part 192 - Criteria for Cathodic Protection and Determination of Measurements require this to be addressed and measures implemented to assure that there will be no impact or stray current corrosion induced by the HVDC lines in the proximity of the gas lines.</p>
³ http://ascelibrary.org/doi/abs/10.1061/9780784413142.093 ⁴ http://www.nace.org/cstn/Store/Product.aspx?id=b7a6056e-bb57-df11-a321-005056ac759b	6

IND204 – Paul Blanch (cont'd)

-7-

September 27, 2014

IND204-1
(cont'd)

5. 49 CFR 192.615⁵ requires “each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency.”

There is no discussion within the DEIS as to how this problem will be addressed especially when remotely operated valves are controlled from Houston, Texas.

6. 49 CFR §192.616 Public awareness requires “each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute’s (API) Recommended Practice (RP) 1162 (incorporated by reference, *see* §192.7).”

There is no discussion within the DEIS of the application as to how this is being addressed. This public education process must include the potential consequences of impact to the Indian Point nuclear plants and how an accident would be minimized.

7. The requirements of 49 CFR 192 Subpart I.—OPERATIONS⁶ TRANSPORTATION OF NATURAL AND OTHER GAS BY PIPELINE: MINIMUM FEDERAL SAFETY STANDARDS are not addressed within the DEIS.

8. 30 CFR Part 380 states: “Describe measures used to exclude the public from hazardous areas. Discuss measures used to minimize problems arising from malfunctions and accidents **with estimates of probability of occurrence** (emphasis added) and identify standard procedures for protecting services and public safety during maintenance and breakdowns.”

There is no discussion within the DEIS as to how these requirements are addressed especially the probability and

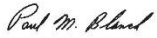
⁵http://www.eefr.gov/cgi-bin/text-idx?SID=feed3509ef9a6b39ee12360353228fd6&node=se49.3.192_1615&rgn=div8

⁶<http://www.ecfr.gov/cgi-bin/text-idx?SID=feed3509ef9a6b39ee12360353228fd6&node=sp49.3.192.1&rgn=div6>

IND204 – Paul Blanch (cont'd)

604702627-0000 FBLV FVF (UNCLASSIFIED) 2/62/6048 0:49:30 PM	
	– 8 – September 27, 2014
IND204-1 (cont'd)	<p>consequences of an accident and/or malfunction.</p> <p>9. Based on the results of the Fukushima nuclear meltdowns the Social and Economic consequences may exceed \$1 Trillion should an accident occur with consequential damage due to proximity to Indian Point and NYC. Consequential damages from secondary fires and explosions from the millions of gallons of fuel oil stored on the Indian Point site must also be considered</p> <p>10. The Nuclear Regulatory Commission has specifically notified⁷ all nuclear facilities of the potential dangers of locating gas lines in the vicinity of nuclear plants. Neither the Spectra application nor the DEIS address this major risk.</p> <p>There is no discussion of the potential for preventing terrorism and the impacts of such an event.</p> <p>As stated in the DEIS: “To ensure that the AIM Project would not present new safety hazards to the IPEC facility, we are recommending that Algonquin file the final conclusions regarding any potential safety-related conflicts with the IPEC based on the Hazards Analysis performed by Entergy.</p> <p>It is imperative that this “Hazards Analysis” be performed by an independent, qualified party with oversight from representatives from local legislators and residents.</p> <p>In summary, the proposed AIM project poses extreme dangers to the residents of Westchester County and surrounding areas that include pipe corrosion to the new and existing gas lines, damage due to installation and subsequent construction accidents, and other events that may impact the environment.</p>
	<hr/> <p><small>⁷ INFORMATION NOTICE NO. 91-63: NATURAL GAS HAZARDS AT FORT ST. VRAIN NUCLEAR GENERATING STATION</small></p>
	8

IND204 – Paul Blanch (cont'd)

6037922627-0000 COVER PAGE UNCLASSIFIED 2/6/97 6037 0167130 P01	
- 9 - September 27, 2014	
IND204-1 (cont'd)	I would appreciate a detailed written response to these issues prior to the finalization of the DEIS.
	Sincerely;
	
	Paul M. Blanch 135 Hyde Rd. West Hartford, CT 06117 860-236-0326
	Cc: Chairman Allison M. Macfarlane USNRC
	Mr. John Sipos State of New York Assistant Attorney General
9	

IND205 – Tatyana Komin

20140929-5083 FERC PDF (Unofficial) 9/29/2014 9:35:48 AM

Tatyana Komin, New Rochelle, NY.
Dear Ms. Rose,

IND205-1 I live in New Rochelle, Westchester, NY since 2003 and NY State since 1993. I am very concerned about the AIM Pipeline Expansion project because it an expansion that will run near Indian Point Power Plant. When I first heard news of this, it immediately raised red flags for me, so I started researching more about safety evaluations for the project. I found out that a public evaluation has not been made available at all (national security was cited). I think that this is completely unacceptable, and it feels like safety of Westchester residents is being neglected. I came across the research of experienced energy contractor Paul Blanch, he found many problems with the AIM project with respect to Indian Point safety, and also no independent, publicly available safety evaluations. Below are some concerns paraphrased from work of Paul Blanch's and other analysts that I collected. I am very, very concerned about these. All must be answered by Spectra, FERC and NRC clearly before any work can begin.

1. Spectra is proposing to build an additional 42" diameter gas transmission pipeline with triple capacity, just 1500 feet from the active IPEC site and spent fuel release. This pipeline will be utilized by at least three projects: the AIM, the Atlantic Bridge and the Access NorthEast Project. Even though, the Spectra doesn't plan to provide information about the coexisting of Indian Point and new huge pipeline before applying to FERC. Neither NRC nor Entergy are providing information, and we need an independent evaluation into Indian Point safety concerns regarding this expanded pipeline.
2. Original license for pipeline required automatic shutoff valves to quickly shut off gas in case of accident. Spectra has removed these valves, and now it is hard to shut off quickly for accident. This is a huge risk and must be addressed. Remote control from Texas is unacceptable.
3. In the past NRC had concerns about natural gas near other nuclear facilities and took action. In 1991, it alerted all nuclear power plant operators to potential hazards after it discovered that natural gas wells were drilled and pipes installed near the Fort St. Vrain nuclear facility in northern Colorado without being properly studied. That plant was closed in 1992. I think the same should happen with AIM (and in fact Algonquin) - at this point, AIM and IPEC safety has not been properly studied.
4. Jim Hall, a pipeline safety expert who served as chairman of the National Transportation Safety Board under President Bill Clinton, said pipelines in a sensitive area like near a nuclear reactor should have a backup system that would kick in if the initial shutoff system failed. Spectra does not have any plan like this, as far as I know. We need every measure possible for safety anywhere near a nuclear power plant.
5. The proposed by Spectra a 42" gas pipeline also intersect with a proposed underground high-voltage transmission line (the WPPT project - the West Point Partners Transmission Project). According to American Society of Civil Engineers and National Association of Corrosion Engineers, High Voltage Direct Current (HVDC) lines can introduce stray currents that will corrode the pipes. This HVDC line will directly

IND205-1

See the responses to comments FA4-25, SA4-5, SA7-4, SA14-11, and IND204-1.

IND205 – Tatyana Komin (cont'd)

20140929-5083 FERC PDF (Unofficial) 9/29/2014 9:35:48 AM

IND205-I
(cont'd)

intersect with both the new and 60 year old degrading existing gas transmission lines and piping systems and tanks at the Indian Point facility. These power lines are one more threat to the Algonquin – IPEC safety. We need a full, independent safety evaluation regarding WPPT – AIM and IPEC, before AIM can be approved.

All these factors contribute to potential nuclear threat to Westchester residents (especially, as Paul Blanch points out if terrorism is considered). Mr. Blanch has more in his public letter to NRC in 2010 (<https://gbadupws.nrc.gov/docs/ML1036/ML103620293.pdf>) and other submissions. FERC cannot call the pipeline safe for Indian Point without addressing all these. I believe an independent and thorough safety review must be conducted and results released publicly, and debated publicly, before AIM can be approved. As things are, I see this project pose a serious nuclear risk to Westchester, Rockland, and Putnam residents.

Sincerely,
Tatyana Komin, Westchester

Here some references:
<http://www.huffingtonpost.com/huff-wires/20101025/us-indian-point-gas-line/>
<http://www.nace.org/catm/Store/Product.aspx?id=b7a6056e-bb57-df11-a321-005056ac759b>

IND206 – Martha Klein

20140929-5087 FERC PDF (Unofficial) 9/29/2014 9:57:39 AM

Martha W. Klein, Norfolk, CT.

Dear Ms. Rose,

IND206-1

I am writing to comment on Docket #CP14-96. The AIM DEIS released this summer contains a foundational error of science, and therefore FERC should do it over. On page 3-9, the DEIS states that "life cycle greenhouse gas emissions for coal-fired electricity generation range from 36 to 47% higher than for natural gas fired electricity." This statement is demonstrably false. According to the Union of Concerned Scientists, life cycle greenhouse gas emissions for coal and gas are nearly equal. To understand why, it is necessary to talk briefly about science. Methane, the largest component of gas, is eighty times more potent than carbon dioxide as a greenhouse gas. That means that methane is eighty times stronger than carbon dioxide at trapping heat in the atmosphere. In addition, approximately 5% of all gas drilled, fracked or extracted leaks into the atmosphere. For those reasons, methane is equal as a greenhouse gas to coal, so the reasons given for switching from coal to gas are false, unfounded, and scientifically unsupportable. As recognized in the DEIS, methane has a global warming potential twenty five times worse than that of carbon dioxide. It is true that burning methane produces less carbon dioxide than burning coal, but because of the powerful global warming potential of methane, because to the high incidence of leaks, and due to the serious errors of science that the DEIS contains, this project cannot be approved, and the DEIS should be done over to correct the mistakes.

Switching from coal to gas would lead to a global temperature increase of 3.5 degrees Celsius, a result which is regarded as catastrophic by climate scientists. In the AIM DEIS, the alternatives analysis failed to include climate change as a variable, and therefore the analysis is wholly inadequate. 97% of the world's scientist acknowledge that human induced climate change is a serious reality. By refusing to even note in the DEIS that burning gas produces devastating events environmentally, to say nothing of extracting it, FERC demonstrates that the document is not informed by science, but rather by the goals of the gas industry.

IND206-1

See the response to comment FA4-23 for additional information regarding Algonquin's methane emission minimization efforts. See the response to comment CO7-3 for additional information regarding methane global warming potential. See the responses to comments CO12-13 and CO14-55 for additional information regarding GHG impact assessments prepared for the Project.

IND207 – Joan Keiser

20140929-5089 FERC PDF (Unofficial) 9/29/2014 10:05:48 AM

Joan Keiser, Bronxville, NY.
Dear Secretary Rose,

I oppose the AIM project for many reasons:

- IND207-1 | Nuclear Power Plant and Gas Transmission pipelines cannot co-exist, especially when the gas transmission pipeline is planned to be so close to the nuclear facility, just 1500 feet. The risk evaluation must be done by NRC (Nuclear Regulatory Commission) and Entergy, the owner of Indian Point or IPEC. The results of the risk assessment must be published.
- IND207-2 | There are more than 20 million residents within 50 miles of IPEC! This project puts these millions of people – including Westchester residents – under substantially increased risk from nuclear catastrophe at Indian Point due to pipeline explosion, something that is not at all uncommon in natural gas infrastructure. We cannot afford to have another Chernobyl or Fukushima scale disaster on account of this natural gas pipeline. An accident at Indian point is likely to cause damage in the thousands of billions of dollars. The damage already done at Fukushima is approaching \$500 billion.
- IND207-3 | The gas will not be for Westchester or NY consumption, it will be sent to the New England and exported to Canada, so we will get no benefit from it at all, only a serious nuclear threat in our backyards. Explosions in natural gas pipelines are not uncommon, so the Indian Point threat is severe. As a recent example, in 2010 a 30" transmission line exploded in San Bruno California (compare, the AIM project plans to install a 42" diameter gas transmission pipeline), where 8 people died, and the resulting shockwaves were registered by US Geological Survey as a 1.1 earthquake!
- IND207-4 | The AIM project is the potential threat to drinking water for millions of New York residents.

Sincerely,
Joan Keiser, Westchester, NY

IND207-1 See the response to comment FA4-25.

IND207-2 See the response to comment CO15-4.

IND207-3 See the response to comment FA4-25.

IND207-4 Section 4.3.2.1 of the EIS discusses the Project's potential to impact the watersheds that supply water to the New York City metropolitan area.

IND208 – Howard Sorett

20140929-5093 FERC PDF (Unofficial) 9/29/2014 10:29:57 AM

IND208-1

Howard Sorett M Sorett, West Roxbury, MA:

I oppose the routing of this project through The West Roxbury Lateral and by The West Roxbury Crushed Stone Quarry.

My concerns are about the project stem from the proximity of the portion of the West Roxbury Lateral - the lines and compression station - that run directly in front of the functioning West Roxbury Crushed Stone Quarry. I do not dispute the integrity of the materials used to construct and protect both the pipeline and station.

My concern is with the potential human failure rate based upon the historical data and the consequence: in assembly, maintenance, and monitoring.

An additional safety concern is based upon the number of multi-ton lorry trucks that enter and exit the quarry daily from a location directly opposite the proposed location of the compression station, into an intersection in which has had multiple fatal automotive accidents within the past few years.

My concern is for the disastrous consequences if a lorry driver were to lose control of their vehicle or is involved in a collision and crashes into the station.

The West Roxbury Lateral portion of this project falls within a densely populated residential neighborhood. Based on this fact and the risks cited I oppose the routing of this project through The West Roxbury Lateral and by The West Roxbury Crushed Stone Quarry.

Howard Sorett
54 Baker Street
West Roxbury, MA 02132

IND208-1

There are many gas transmission pipeline crossings of roads within the street in the U.S. Further, PHMSA's regulations include safety measures for the design of pipelines under roads (see section 4.12.1 of the EIS and depth of burial). We also note that there is an existing natural gas distribution pipeline within the street closer to the quarry than the proposed pipeline. See also the response to comment FA6-1 and SA4-5.

IND209 – Roseanne Brackett

20140929-5103 FERC PDF (Unofficial) 9/29/2014 10:34:12 AM	
	My name is Rosanne Brackett. I am a current resident of Yorktown Heights NY. I have 2 children, 5 and 2 years old.
IND209-1	The reason I am here, is to demand that a transparent and independent risk analysis study be done to determine all the risks for all of the towns involved in the AIM expansion. This study should be done by an independent engineering/environmental organization. The cost for this study should be borne by Spectra.
IND209-2	I would like to also ask that Spectra's next project "Atlantic Bridge" be added into this analysis. It would violate the laws of segmentation set forth by NEPA, to get AIM approved, and months later continue on with the Atlantic Bridge. If this is a second phase of the expansion of the Algonquin Transmission, the risks need to be evaluated together. We know this is happening. Yorktown homeowners have been called to a meeting for 9/29. Why is this not being considered SEGMENTATION?
IND209-3	I feel that Spectra is a billion dollar company, who sees more billions in their future, and all they have to do to get it, is put our lives at risk, and rip up our streets, yards and parks. When they head home, the towns are left to deal with the aftermath. They have the resources to find ways around the law for their own gain. Me, I am a stay at home mom of 2 small children, who is just trying to find an hour in my day to do some research and find out what is really going on here.
IND209-4	We have a right to know what risks are involved in the full scope of this project. Yorktown will be hit twice. Once with a pigging station and the destruction of 25 acres of Parkland for Spectra's construction yard, and then again with Atlantic bridge, where countless homes and roads will be torn up. Can someone please hold this company to letter of the law and demand that for our protection this environmental review be done, combining both projects?
IND209-5	At the hearing, I also added a comment to the 2 speakers who were right before me discussing the fact that the pipeline is old and needs to be replaced. Since there are 2 Pipelines, a 26 inch and a 30 inch, which were installed within 5 years or each other, why aren't they both being replaced?

IND209-1	Section 4.12 of the EIS provides an analysis of the safety-related aspects of the Project.
IND209-2	See the response to comment FA3-5.
IND209-3	Comment noted.
IND209-4	See the responses to comments FA3-5 and LA26-7.
IND209-5	Section 3.5.1 of the EIS explains why the existing pipelines would need to remain in service. See also the response to comment SA14-12.

IND210 – Erik Lindberg

20140929-5117 FERC PDF (Unofficial) 9/29/2014 11:14:07 AM	
IND210-1	<p>Erik Lindberg, Peekskill, NY.</p> <p>September 29th is the deadline for comments on the Algonquin Incremental Market project. On that same day, residents have been invited to a homeowners meeting in Yorktown NY about Spectra's Atlantic Bridge Project, which includes additional compression at the Southeast Station and the replacement of a 4 mile stretch of 26" pipe with 42" pipe in Westchester county. These facilities fall either within or directly adjacent to the AIM study corridor. Scoping, surveying and review of Atlantic Bridge will take place during the same time frame as the proposed AIM construction, and the facilities are clearly interdependent. Does this not represent project segmentation?</p> <p>The draft EIS must be revised to provide analysis of the cumulative impacts of both projects, as well as any functionally and financially connected projects planned on the Algonquin pipeline as part of a broader development plan. Not to do so undermines the public trust and prevents residents from understanding the full economic and environmental impacts of the proposals.</p>
IND210-2	<p>In Cortlandt township, the more pressing concern is the safety of the new 42" pipeline. As the infrastructure may be in the ground for 50 or more years, it is imperative that residents and communities have an honest assessment of the risks.</p> <p>Given recent examples of pipeline ruptures (such as San Bruno, CA in 2010) where the actual impact radius exceeded the projected Potential Impact Radius calculated for that section of pipe, can 845 ft. be considered a reliable PIR for the proposed sections of new 42" pipeline?</p> <p>Has the commission considered other methods for calculating the Potential Impact Radius, such as heat flux values, rates of gas discharge in the event of a rupture, and the threat of secondary fires?</p> <p>Buchanan-Verplanck Elementary School, nearby Village Park, Yorktown's Legacy field, portions of the Indian Point Energy Center and its electrical substation, as well as hundreds of homes are within the PIR as currently calculated. These are locations where people gather outside and unsheltered. Remote valving is not an adequate safety mechanism for protecting human life in the event of a rupture in these areas. The new pipeline segment in Verplanck is of particular concern, as it represents a new and significant risk to the public.</p>
IND210-3	Has the commission considered alternate routes for the new pipeline that does not include sites where people gather outside and unsheltered, where valving will not protect them in the critical moments after an ignition?
IND210-4	Has the commission considered how Algonquin's integrity management plan, particularly the remote valving system, will change as the pipeline ages?
IND210-5	Further, it is inexcusable that critical documents and safety reviews remain absent from the EIS as the comment period comes to a close. Where

IND210-1 See the response to comment FA3-5.

IND210-2 Section 4.12 of the EIS extensively addresses the reliability and safety of the proposed facilities. See also the responses to comments FL8-3 and IND71-5.

IND210-3 The FERC staff evaluated a number of route and site alternatives to the proposed Project facilities including any specific alternatives identified by stakeholders other than the applicant. Our assessment of these alternatives is included in sections 3.5 and 3.6 of the EIS.

IND210-4 As discussed in section 4.12.1 of the EIS, in compliance with DOT's safety regulations Algonquin performs a detailed risk analysis for its entire pipeline system each year, which allows it to prioritize integrity management activities such as integrity assessments and additional preventative measures, including any issues surrounding remote valving.

IND210-5 See the response to comment FA4-25.

IND210 – Erik Lindberg (cont'd)

20140929-5117 FERC PDF (Unofficial) 9/29/2014 11:14:07 AM

IND210-5 | Is the Indian Point Energy Center risk assessment? Will the public have
(conf'd) | the opportunity to comment on it when it is completed?

IND210-6 | The RIS is incomplete and should be withdrawn until these issues are
| addressed and the public has had the opportunity to examine and comment
| on the results. Residents who are asked to assume the risks of such
| projects without receiving a benefit are owed at least that much: an
| honest and sober look at how this will effect their lives and property
| for decades to come.

IND210-6 See the response to comment FA4-1.

IND211 – Rebecca Quigley

20140929-5192 FERC PDF (Unofficial) 9/29/2014 1:28:24 PM

IND211-1

Rebecca Quigley, Cortlandt Manor, NY.
I am writing to respectfully request that FERC reconsider the proposal to expand the Algonquin Pipeline in the area directly behind the Buchanan-Verplanck Elementary School, in Buchanan, NY. There are 280 children enrolled in that school (ranging in age from Kindergarten to 5th Grade), and they will absolutely be in harms' way if there is a pipeline accident or explosion. Buchanan is already home to the Intergy Nuclear Power Plant, why must they shoulder an additional burden to their neighborhood home values and environment with this pipeline expansion?

As a worst case scenario, our Superintendent Joseph Hochreiter has met with SPECTRA. He learned that it may be possible to reroute the pipeline under Broadway in Buchanan, under already existing Intergy Power Plant lines to one of their substations. This option needs to be more thoroughly explored and pursued, even if it means more time and expense to SPECTRA. Aren't our children worth that?

Thank you for your time and consideration.
Rebecca Quigley
Frank G. Lindsey Elementary School, Montrose, NY
PTA Co-President

IND211-1

See the responses to comments FA4-25 and SA1-9. Alternatives to the Hudson River crossing, and therefore the area around Buchanan-Verplanck school, are presented in section 3.5.1 of the EIS.

IND212 – Amy Irene Anderson

20140929-5135 FERC PDF (Unofficial) 9/29/2014 11:50:53 AM	
IND212-1	<p>Any Irene Anderson, Kingston, NY.</p> <p>The Proposed Algonquin Incremental Market project (AIM) Pipeline should be rejected and denied for several reasons including but not limited to the following:</p> <p>The proposed location for the pipeline presents a potential nightmare scenario for the mother of all disasters. Situated near the spent fuel rods of the Indian Point Nuclear Power Plant and major electrical transmission lines, an explosion, due to leakage or terrorist attack could be worse than disastrous.</p>
IND212-2	<p>The pipeline would enable and encourage more hydrofracturing for "natural" gas. The fracking process is fraught with danger due to various causes including failed well casings, radioactive drill cuttings, radon gas and toxic wastewater spills. The extreme energy inputs and methane leakage make fracked gas a greenhouse gas contributor equal to coal, and the process has caused earthquakes where they've never happened before.</p>
IND212-3	<p>Taxpayers and victims of any accidents should NOT be subsidizing a pipeline that is primarily designed to facilitate the export of gas via dangerous LNG terminals. The citizens of this country do not exist for the purpose of corporations polluting our land and water only to ship the bulk of their product overseas for greater profit. This is nothing short of disgusting.</p>
IND212-4	<p>The money wasted on this insane project and the very questionable fracking process would be much better spent on energy conservation and renewable energy. A study by www.thesolutionsproject.org along with similar studies published in the November 2009 and April 2013 editions of Scientific American shows how with existing technology we can transition to 100% renewable energy in a few decades while saving billions of dollars and thousands of lives in the process.</p> <p>Please consult your conscience and do the right thing: SAY NO TO AIM.</p>

IND212-1 See the responses to comments FA4-25, SA7-4, and CO7-3.

IND212-2 See the responses to comments FA4-24 and SA4-4.

IND212-3 See the responses to comments CO15-4 and IND102-3.

IND212-4 See the response to comment CO7-5.

IND213 – Edith Kantrowitz

20140929-5140 FERC PDF (Unofficial) 9/29/2014 11:58:22 AM

Edith Kantrowitz, Brooklyn, NY.

IND213-1 I am writing in opposition to this pipeline. The proposed new pipeline would intersect underground in Verplanck with another proposed West Point Partners 1000-megawatt electric transmission line just a few hundred feet from the Indian Point Nuclear Facility and its 40 years of spent nuclear fuel rods, near the Ramapo and Stamford faults. This is an insane and unacceptable public safety risk! Explosions have occurred in both compressor stations and gas pipelines. An explosion at or near Indian Point would be an unimaginable catastrophe.

IND213-2 Other problems include:

- High levels of radon, the leading cause of lung cancer among non-smokers in the U.S., will be transported through the pipeline from Pennsylvania's Marcellus Shale.
- Noisy, polluting compressor station expansions proposed for Stony Point and Southeast expose people, pets and wildlife to many tons of highly toxic emissions per year.
- Health effects associated with compressor stations emissions: nosebleeds, headaches, dizziness, skin rashes, respiratory, developmental and neurological problems, breast, kidney and liver cancer.
- Risk to home values! The proximity of the high pressure pipelines and potential for an explosion could negatively impact your property, diminish its value, and reduce your quality of life.

IND213-5

IND213-6 This gas pipeline project should not go forward. We should not be relying on shale gas for our energy needs. We must transition immediately to renewables: solar, wind, and other sustainable energy sources. If we do not, runaway climate change will produce catastrophic results. Please listen to what the public wants. We do not want this gas pipeline.

IND213-1 See the responses to comments FA4-25, SA4-2, and SA7-4.

IND213-2 See the response to comment SA4-4.

IND213-3 See the responses to comments SA4-1 and SA4-9 regarding compressor station emissions and emission impact assessment. See the response to comment IND1-3 for additional information regarding compressor station noise.

IND213-4 See the responses to comments SA4-1 and SA4-9 regarding compressor station emissions and emission impact assessment on health.

IND213-5 See the response to comment LA23-21.

IND213-6 See the response to comment FL2-2.

IND214 – Sara Driscoll

20140929-5149 FERC PDF (Unofficial) 9/29/2014 12:14:08 PM

IND214-1 Sara Driscoll, Jamaica Plain, MA.
Dear FERC members,
I am writing to discourage you from approving the Algonquin Co's request for a spur pipeline into W. Roxbury, MA as it: 1) poses a threat to the entire community since it runs too close to the rock quarry which has frequent explosions; 2) encourages the continued use of fossil fuels in our communities. Fuels that we are moving desperately to discontinue for their deleterious effect on our communities and our entire planet. The fact that Algonquin tried to sneak by with a "community" meeting a few weeks ago, only adds to the distrust that community members experience due to the unethical behavior of these gas, coal and oil companies. We hope to see you at the October 8th Community meeting in West Roxbury. Thank you for your consideration of this request.

IND214-2

IND214-1 See the response to comment FA6-1.

IND214-2 See the response to comment FA6-5.

IND215 – Patricia Johnson

20140929-5153 FERC PDF (Unofficial) 9/29/2014 12:22:59 PM	
<p>Patricia Johnson, Yorktown Heights, NY.</p> <p>Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426</p> <p>RE: Algonquin Incremental Market Project, Docket No. CP14-95 Comments on the DEIS made at a public hearing in Cortlandt Manor, New York</p> <p>Dear Secretary Bose and Commissioners:</p>	
IND215-1	<p>I am making these comments under protest. There are fundamental flaws in FERC's approval process and the Draft Environmental Impact Statement (DEIS.) Therefore, I demand that the DEIS be withdrawn and that a Supplemental Draft Environmental Impact Statement be submitted for public review only after all relevant parties have submitted all the necessary information.</p>
IND215-2	<p>Highlands Biodiversity Corridor</p> <p>The proposed pipeline runs directly through the Highlands Biodiversity Corridor. This biodiversity rich and fragile region runs through four states, and as such demands the highest protection available. Bifurcating a habitat with any construction dramatically degrades the quality, in some instances irreparably. The DEIS consistently minimizes or ignores the environmental sensitivity and rich biodiversity of the impacted areas. How can the public be certain that all necessary and appropriate measures are being taken to preserve biodiversity throughout the impacted area?</p>
IND215-3	<p>2.2.1.1 Replacement</p> <p>It is false and misleading to refer to the pipeline expansion as "a replacement." How can we be certain that the public understands that this project is a plan to expand the 26" pipeline to 42"--which in turn is a 62% increase in capacity--when inaccurate statements such as this are made?</p>
IND215-4	<p>Consistent Standards as a New Pipeline</p> <p>This major expansion merits the same stringent evaluation as would any new gas pipeline proposal. If a new pipeline of any size would not gain approval in a similar proximity to a nuclear power plant, the new pipeline resulting in a 62% increase should not either. How can the public be assured that Spectra is not abusing the grandfather clause?</p> <p>Old Pipes in Need of Replacement</p> <p>If the pipeline is indeed in need of replacement, why is the parallel pipeline not receiving maintenance? Why is the public not informed about the current health and safety issues related to the old pipelines? Which is it? Are the existing pipelines are in need of repair, or is this</p>

IND215-1 See the responses to comments FA4-1 and SA1-12.

IND215-2 Comment noted. As explained in section 4.7.2 of the EIS, Algonquin has planned the Project to minimize tree clearing, impacts on migratory birds and wildlife, and other sensitive resources by using their existing rights-of-way to the maximum extent possible. See also the responses to comments FA4-26, SA11-14, and CO22-12.

IND215-3 Section 1.1 of the EIS states that the purpose of the Project is to increase capacity. Algonquin would accomplish this in New York by replacing a segment of the existing 26-inch-diameter pipeline with a larger, 42-inch-diameter pipeline.

IND215-4 This Project has been evaluated as a new pipeline. The existing 26-inch-diameter pipeline does not "need" replacement for safety purposes. Algonquin proposes to replace a segment of this pipeline because the existing pipeline cannot accommodate the additional capacity. See also the responses to comments FA4-25 and IND215-3.

IND215 – Patricia Johnson (cont'd)

20140929-5153 FERC PDF (Unofficial) 9/29/2014 12:22:59 PM	
IND215-4 (cont'd)	project an expansion? It seems that the DEIS is trying to play this both ways.
IND215-5	Measures to Protect Endangered and Species of Special of Concern Inconsistent Rights of Way are known habitat for many fragile species, and stringent protection measures should be guaranteed for the entire length of this project. Species of special concern are being treated differently in Connecticut than in Massachusetts and New York. Why are conservation measures not standardized for endangered, threatened and species of special concern in all states? How can the public be assured that protections will not be implemented in a haphazard, arbitrary, and capricious manner?
IND215-6	Federally Endangered Bog Turtle The federally threatened and state endangered bog turtles are cryptic, meaning they tend to be concealed or camouflaged and hence are extremely difficult to find in their habitat. It can take a qualified herpetologist many hours in the field when weather conditions are suitable for peak activity to locate even a single animal. Merely stating that someone searched an area during the months of March – May is not sufficient. Since there is recognized high-quality habitat in the project area, a detailed accounting of conditions and person hours spent in the field needs to be included in the DEIS. Without this type of documentation, how can the public be confident that the federal protocol and recovery plan have been followed and that this federally listed, state endangered species is in fact protected?
IND215-7	Post Construction Mitigation Efforts and Long-Term Management How can the DEIS be considered complete when there is no specific articulation of what actual mitigation measures will be taken?
IND215-8	Due to the fact that this DEIS is woefully incomplete, FERC must postpone the approval until the DEIS is thorough and complete and the public has been given ample time to review and voice their opinions. If approved, the Spectra project will be arbitrary and the approval will have been granted based on an unconscionable disregard for and abuse of the public's legal right to full disclosure, review, and informed comment. Again, my comments are made under protest. Patricia Johnson Certified Reptile Monitoring, Smithsonian-Mason School of Conservation 2013 NY State licensed wildlife rehabilitator #1337 www.TurtleAdvocate.org 347-242-7058 427 Spring Dr. Yorktown Heights, NY 10598

IND215-5	As discussed in section 4.7 of the EIS, Algonquin has consulted with the FWS and NOAA Fisheries for federally listed species under their jurisdiction, as well as the appropriate state agencies for state listed species and other sensitive resources under their respective jurisdictions. How each state agency implements and enforces their protected species laws and chooses to recommend conservation recommendations for such species is beyond the scope of the EIS.
IND215-6	See the response to comment CO14-46.
IND215-7	The EIS describes the impacts and proposed mitigation measures or those measure recommended by us throughout the resources.
IND215-8	See the responses to comments FA4-1, FA6-5, and SA2-10.

IND216 – Gary Shaw

20140929-5241 FERC PDF (Unofficial) 9/29/2014 3:08:48 PM

Gary Shaw, Croton on Hudson, NY.

To:

Federal Energy Regulatory Commission (FERC)

re: Docket: CP14-96-000 (Algonquin Pipeline expansion - AIM)

To Whom It May Concern:

IND216-1

The Algonquin Pipeline expansion from 26" pipeline diameter to 42" is unwarranted and potentially disastrous because of its proximity to an aging nuclear power plant (NPP) with over 2700 tons of high level radioactive waste on-site and especially because of dependency on offsite electrical power to maintain the integrity of the cooling system in the event that ANY disruption triggers automatic shutdown. Unplanned shutdowns have happened and continue to happen periodically. The fact that the gas line closely aligns with the above ground electrical transmission lines compounds this danger.

There is no other NPP in this country that has high pressure gas lines in such close proximity to operating reactors and spent fuel storage and it is unconscionable to even consider increasing the potential danger in the most densely populated metropolitan area in our country.

Indian Point 3 is classified by the Nuclear Regulatory Commission as the NPP in the US with the highest probability of suffering reactor core damage from seismic activity, and it has been known for decades that there cannot be an effective evacuation because of the inadequacies of the roadways and the impassable river on the eastern border of the Westchester County and the nuclear plant.

It is my understanding that Algonquin is still awaiting receipt of a Hazards Analysis being performed by Entergy (owner of the Indian Point Energy Center - IPEC) and the absence of complete information on potential safety-related issues renders Algonquin's DEIS incomplete a revised DEIS must be prepared for review and public comment to analyze any potential safety-related conflicts with the IPEC. Section 4.12.3.

IND216-2

It is critical that all these factors are taken under consideration and detailed in a revised DEIS and that public commentary be accepted on the REVISED DEIS prior to any finalization and decision rendering by FERC.

Sincerely,

Gary Shaw

9 Van Cortlandt Pl.

Croton on Hudson, NY 10520

IND216-1

See the responses to comments FA4-1 and FA4-25.

IND216-2

See the responses to comments FA4-1, FA6-5, and SA1-12.

IND217 – Gina Flores

20140929-5164 FERC PDF (Unofficial) 9/29/2014 12:34:12 PM

IND217-1 Gina Flores, Milford, PA.
I am completely opposed to any extension of pipeline anywhere, and
especially opposed to gas created through the "fracking" process.
protect our families - our children deserve clean water, air and
environment - this comes above and before corporate profit. What legacy
do you wish to leave?
Thank you.

IND217-1 Comment noted. See also the response to comment FA4-24.

IND218 – Jon Fein

20140929-5167 FERC PDF (Unofficial) 9/29/2014 12:46:48 PM	
IND218-1	<p>Jon Fein, Cortlandt Manor, NY.</p> <p>I am writing to object to the proposed expansion of the Algenquin pipeline, especially through the Blue Mountain Reservation in Cortlandt. In the sixty years since the two pipelines were installed through this woodland and wetland, the area has restabilized ecologically, supporting the interdependence of a wide variety of plant and animal species. The proposed disruption would have disastrous and long-lasting effects. Why, if the plan is to dig up and replace the 26" pipeline, would a 75 foot right of way be necessary? Is the objective to denude the forest between and around the two pipelines? This amount of forest removal would permanently change the habitat of many species and negatively impact the value of this relatively untouched space for human enjoyment and appreciation. As it is, an increasing number of children are experiencing "nature deficit syndrome" and the forest areas, such as the Blue Mountain Reservation, are becoming increasingly rare in Westchester County. I am particularly concerned about the wild raspberry plants that line Montrose Station Road and the current right of way through the park. These bushes provide an important food source for many animals and a delightful natural experience for many people. I doubt that Spectra would be able to leave them alone or successfully replant them if removed. What other wild food sources can people still encounter in today's technological world?</p>
IND218-2	
IND218-3	<p>I will let others articulate concerns about the pipeline's path near Indian Point and the public school in Buchanan, but I share the apprehension about those unacceptable risks.</p>
IND218-4	<p>The DEIS states that it is unlikely that alternate energy sources and/or conservation would meet the energy desires of the Northeast within the "project's timeline." Why would the gas company's timeline be a determining factor, in light of the long-term hazards, harms, and risks that the construction work and a high-pressure pipeline would bring about? FERC's responsibility is to weigh competing values and benefits for the public good. Not enough study and thought has been extended into possible unintended and unanticipated consequences of precipitous and unremediable action to allow the pipeline expansion project to proceed at this point.</p>

IND218-1 See the responses to comments FL8-12, IND84-20, and IND84-24.

IND218-2 Comment noted. Montrose Station Road would not be widened; however, it is anticipated that construction activities would require the clearing of raspberry plants. Impacts would be temporary due to planned restoration and revegetation efforts.

IND218-3 See the responses to comments FA4-25 and SA1-9.

IND218-4 The FERC's assessment of alternatives evaluates the potential impacts and benefits of a number of different alternatives. However, as described in section 3.0 of the EIS, not all conceivable alternatives are technically feasible or practical. Some may be incapable of being implemented due to limits on existing technologies, constraints of system capacities, or logistical considerations, while others may be impractical because sites are unavailable or cannot be developed for the proposed use. Other alternatives may not be able to meet the objectives of the Project. The Project timeline is part of the objectives of the Project because shippers have requested additional capacity by a specified date. See also the response to comment FA6-5.

IND219 – Liz Laliberte

20140929-5166 FERC PDF (Unofficial) 9/29/2014 12:39:34 PM	
Submission Description: (doc-less) Motion to Intervene of Liz Laliberte under CP14-96-000.	
Submission Date:	9/29/2014 12:39:34 PM
Filed Date:	9/29/2014 12:39:34 PM
Dockets	

CP14-96-000 Algonquin Gas Transmission, LLC's Abbreviated Application for a Certificate of Public Convenience and Necessity and for Related Authorizations re its proposed Algonquin Incremental Market (AIM) Project under CP14-96.	
Filing Party/Contacts:	
Filing Party	Signer (Representative)
Other Contact (Principal)	
-----	-----
Individual	luliberte@msn.com
IND219-1	Basis for Intervening: I am filing as a homeowner who resides on the gas line property and concerned about the exclusion of the problem that is already occurring on the Algonquin system of low frequency hum which at times is more than a low frequency hum why is it not being addressed in the draft EIS has for the AIM project. I have concerns what is is doing in relation to the environment as it relates to my property, animals on my property and our familiys physical mental health.

IND219-1

A review of the current service list for this docket indicates that the Ms. Laliberte has been added as a party to the proceeding. See also the response to comment LA34-1.

IND220 – Marie Walsh

20140929-5200 FERC PDF (Unofficial) 9/29/2014 1:36:05 PM	
IND220-1	Marie Walsh, West Roxbury, MA. Please extend time for comments. Please hold a meeting of the community with advance notification to the community. Please allow the community to learn the hazards of this project and to express their concerns. Please publish the environmental studies that have been performed. I am very disappointed in the manner in which this project has so far proceeded. I do not want this project to continue.

IND220-1

See the responses to comments FA4-1 and FA6-5.

IND221 – Bernard Vaughey

20140929-5215 FERC PDF (Unofficial) 9/29/2014 2:27:41 PM	
<p>Bernard Vaughey, Verplanck, NY.</p> <p style="text-align: right;">Bernard Vaughey 215 Broadway Verplanck, NY 10596-0277 September 29, 2014</p> <p>Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street NE, Room 1A Washington, DC 20426</p> <p>RE: Algonquin Gas Transmission, LLC, Docket No. CP 14-96, AIM project Hazard Risk Analysis for IPSC</p> <p>Dear Secretary Bose:</p>	
IND221-1	<p>The DEIS does not include the Hazard Risk Analysis for the Indian Point Energy Center.</p> <p>That report needs to be provided for comment, and it needs to address the correct risk analysis, with correct projected ultimate capacities.</p> <p>That analysis must be for the ultimate potential capacity of the gas line, not just the incremental amount requested under the AIM project. Failure to evaluate the full capacity of the line will result in a flawed analysis, based upon information available at this time.</p> <p>As of September 16, 2014, Spectra has announced potential increases from two projects that will significantly increase the volume of gas flowing thru the Stony Point to Yorktown segment, the Atlantic Bridge and the Access Northeast projects.</p> <p>At a minimum, any analysis needs to address and indicate the capacities that were used in the evaluations. Is it the 1.73 Bcf/d in the AIM project, or the significantly higher number with the other projects.</p> <p>It is not reasonable for this information to not be available and commented on prior to any construction, as failure to be able to address the risk to IPSC properly may affect the viability of the entire project.</p>
IND221-2	<p>The current DEIS should be withdrawn or rejected. At a minimum, we need a SDEIS to be prepared and circulated, with a STANDARD review period, not the EXPEDITED review that Spectra has requested for this project.</p> <p>Thank you.</p> <p>Bernard Vaughey</p> <p>Cc: Supervisor Linda Puglisi Mayor Theresa Knickerbocker Daniel Riesel, Esq.</p>

IND221-1

See the responses to comments FA3-5, FA4-25, and FL4-10.

IND221-2

See the responses to comments FA4-1, FA6-5, SA1-12, and SA2-10.

IND222 – Bernard Vaughey

20140929-5223 FERC PDF (Unofficial) 9/29/2014 2:30:52 PM	
<p>Bernard Vaughey, Verplanck, NY. 215 Broadway Verplanck, NY 10596-0277 September 23, 2014</p> <p>Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street NW, Room 1A Washington, DC 20426</p> <p>RE: Algonquin Gas Transmission, LLC, Docket No. CP 14-96, AIM project Contingency for delivery of contracted gas if AIM project is delayed or denied</p> <p>Dear Secretary Bose:</p>	
IND222-1	<p>The DEIS does not address the contingency plan that Spectra and FERC should have in place if the approval process for the AIM project is delayed, if the project were to be denied, or otherwise cannot meet the November 1, 2016 delivery date Spectra has requested.</p> <p>From Resource Report #10, page 10-10: Additionally, the Project Shippers for the AIM Project have requested specific delivery points to the Project Shippers' existing systems in southern New England already connected to Algonquin's system, as well as to three new delivery points on Algonquin's system that do not exist today. Regardless of the alternatives evaluated, the gas supply must reach the delivery points requested by the Project Shippers by November 2016. There are two interstate pipelines within the broad area around the AIM Project area that were evaluated to render the same service as proposed by Algonquin (see Figure 10.3-2). They are Tennessee and Iroquois.</p> <p>Interesting statement - "Regardless of the alternatives evaluated, the gas supply must reach the delivery points requested by the Project Shippers by November 2016."</p> <p>Is there something we have not been made aware of?</p> <p>If the gas supply MUST be delivered, and this AIM project has not been approved yet, what is the contingency plan to make those deliveries? And, why is that contingency plan not defined as an option in the considered alternative to get the requested volume delivered?</p> <p>This contingency plan needs to be addressed, and should have been included in the DEIS. Why?</p>
IND222-2	<p>The current DEIS is flawed and should be withdrawn or rejected. At a minimum, we need a SDEIS to be prepared and circulated, with a STANDARD</p>

IND222-1

Page 10-10 of Algonquin's application pertains to potential system alternatives that might be used to deliver the proposed natural gas volumes requested by the Project's shippers in lieu of the AIM project. If the AIM Project is denied, the shippers would not receive the gas and their need for the proposed volumes would not be met. The shippers existing need for natural gas would need to be met by other means. Two potential options would be for the shippers to contract with either Tennessee Gas Pipeline or Iroquois Gas Transmission for the proposed volumes. Our evaluation of these alternatives in section 3.3.1 of the EIS concluded that the expansion necessary for either Tennessee Gas Pipeline or Iroquois Gas Transmission to deliver the gas to the locations required by the Project shippers would result in much greater environmental impact than the AIM Project, and therefore we do not consider use of either the Tennessee Gas Pipeline or Iroquois Gas Transmission systems to be reasonable alternatives.

IND222-2

See the responses to comments FA4-1, FA6-5, SA1-12, and SA2-10.

IND222 – Bernard Vaughey (cont'd)

20140929-5223 FERC PDF (Unofficial) 9/29/2014 2:30:52 PM

IND222-2
(cont'd) | review period, not the EXPEDITED review that Spectra has requested for
this project.
Thank you.

Bernard Vaughey
Cc:
Supervisor Linda Puglisi
Mayor Theresa Knickerbocker
Daniel Riesel, Esq.

IND223 – Bernard Vaughey

20140929-5226 FERC PDF (Unofficial) 9/29/2014 2:42:39 PM

Bernard Vaughey, Verplanck, NY.

Bernard Vaughey
215 Broadway
Verplanck, NY 10596-0277
September 23, 2014

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Algonquin Gas Transmission, LLC, Docket No. CP 14-96, AIM
project

Potential Impact Radius Document Flaws

Dear Secretary Bose:

IND223-1

The DEIS comment indicates an increase in the distance of the Potential Impact Radius (PIR) in some areas, and the increased risk to other areas that are not currently at risk.

Where is the risk analysis associated with this DOUBLED potential impact radius?

Where is the risk analysis for areas that are currently not at risk?

Do these figures take into account the second high pressure gas main that will cohabitate the same alignment? By that I mean the current 30-inch Algonquin pipeline that will remain in place.

Is the formula used to calculate the PIR accurate? Does it apply to 36-inch and larger pipes? Have the results of this calculation been field-verified by cross-referencing with recent accidents? If not, why not?

Where is a map of the project, overlaying the existing and the new PIR - similar to the alignment sheets in the AIM project - that would provide a clear visual representation for the existing and new PIR. This is necessary for proper comment.

The Potential Impact Radius has increased significantly - nearly 200%. What are the consequences to the existing and new PIR in this area should the line rupture or explode? In clear layman's terms, what is the impact to structures, the environment, and any living creatures within in those PIR limits - the blast or thermal radiation zones.

What would be the minimum safe distance for someone to not be affected by the blast or the thermal radiation from an event?

These and similar health and safety- related issues should have been addressed either prior to the DEIS, or in the DEIS. A reasonable person would expect FERC to be a transparent agency and allow the people affected by this proposed project to have the knowledge and information

IND223-1

Section 4.12 of the EIS discusses federal safety standards for natural gas pipelines, incident rates, and the impact on the public. See the responses to comments FL8-3 and IND71-5 regarding the PIR calculation and methodology. We also note that section 4.12.3 of the EIS notes it is also important to examine the probabilistic level of risks for pipeline-related events. See also the response to comment CO14-25.

IND223 – Bernard Vaughey (cont'd)

20140929-5226 FERC PDF (Unofficial) 9/29/2014 2:42:39 PM

IND223-1
(cont'd) | necessary to decide what they want and don't want based upon clear,
verifiable third-party information. That has not happened to date with
these and other issues related to the AIM project. Why not?

IND223-2 | The current DEIS should be withdrawn or rejected. At a minimum, we need a
SDEIS to be prepared and circulated, with a STANDARD review period, not
the EXPEDITED review that Spectra has requested for this project.
Thank you.

Bernard Vaughey

Cc:
Supervisor Linda Puglisi
Mayor Theresa Knickerbocker
Daniel Riesel, Esq.

IND223-2 See the responses to comments FA4-1, FA6-5, SA1-12, and SA2-10.

IND224 – Bernard Vaughey

20140929-5247 FERC PDF (Unofficial) 9/29/2014 2:50:38 PM

Bernard Vaughey
215 Broadway
Verplanck, NY 10596-0277
September 29, 2014

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Algonquin Gas Transmission, LLC, Docket No. CP 14-96, AIM project
Lack of contingency plan for Hudson River HDD crossing

Dear Secretary Bose:

IND224-1

The DEIS does not address the possibility of an open cut installation method across the Hudson River at the now preferred alternate location, nor does it address a contingency plan, should the HDD efforts, as proposed, under the Hudson River, fail.

Section 3.5.1 of the DEIS addresses some of the pros and cons of the existing Hudson River crossing and the now-preferred alternate southern crossing. This section, Section 3.5.1 of the DEIS, also brings up a potential alternative that will need substantial additional review: **the possibility of an open cut across the Hudson River. This DEIS must address that potential contingency**, and whether that open cut across the Hudson would be considered at the existing northern crossing, at the proposed southern crossing, or at some other location. It does not.

3.5.1 Hudson River Northern Route Alternative

*While the alternative route crossing for the Hudson River provides several environmental advantages over the proposed crossing, the Hudson River Northern Route Alternative would not be technically feasible and would not provide any significant advantages over the proposed route. The probability of drill failure is significantly higher for the alternative route. If this were to occur, multiple attempts at the HDD or an alternative crossing method (**such as the open cut method**) could be required, which would increase the time required to complete the crossing and/or result in additional impacts on the environment.*

Page 2-36 of the DEIS indicates

*To date, **Algonquin has not provided a contingency plan** that incorporates another location or another construction methodology for each HDD crossing. Therefore, if an HDD in its proposed location proves unsuccessful, Algonquin would be required to identify a new location for the crossing or new methodology, and request approval for the new location or methodology with all applicable agencies.*

The absence of an HDD contingency plan should be unacceptable to all parties. Spectra should know what their options are. All applicable agencies, and the public, need a standard review period, not an

IND224-1

See the responses to comments SA11-6 and IND193-8.

IND224 – Bernard Vaughey (cont'd)

20140929-5247 FERC PDF (Unofficial) 9/29/2014 2:50:38 PM

IND224-1
(cont'd)

expedited review period in this DEIS, in order to review any contingency. It is not even clear if there would be any public comment period if a new crossing or methodology were to become necessary. This is unacceptable.

As the completion of the entire project is supposedly time-sensitive and contingent upon a new Hudson River crossing, and the variables and unknowns associated with it, why has FERC allowed the project to even progress to the DEIS stage, especially since it would appear the DEIS is NOT MEETING one of the criteria, section 5.2.5.5, section 5, of Algonquin's Erosion and Sediment Control Plan that FERC has supposedly reviewed?

Obtained from a reviewing agency website, the Algonquin Erosion and Sediment Control Plan – revised 10/8/13, for the Aim project states:

5.2.5.5 Horizontal Directional Drill

For each waterbody or wetland that would be crossed using the HDD method, prepare a plan that includes:

- 1. Site-specific construction diagrams that show the location of mud pits, pipe assembly areas, and all areas to be disturbed or cleared for construction;*
- 2. Justification that disturbed areas are limited to the minimum needed to construct the crossing;*
- 3. Identification of any aboveground disturbance or clearing between the HDD entry and exit workspaces during construction;*
- 4. A description of how an inadvertent release of drilling mud would be contained and cleaned up; and*
- 5. A contingency plan for crossing the waterbody or wetland in the event the HDD is unsuccessful and how the abandoned drill hole would be sealed, if necessary.*

IND224-2

It is reasonable, necessary and requested that Algonquin provide a full contingency plan, for review by all the appropriate agencies, in a Supplemental DEIS (SDEIS) package, with the appropriate review and comment period.

The current DEIS should be withdrawn or rejected. At a minimum, a SDEIS should to be prepared and circulated, with a STANDARD review period, not the EXPEDITED review that Spectra has requested for this project.

Thank you.

Bernard Vaughey

Cc:

Assemblywoman Sandy Galef
Supervisor Linda Puglisi
Mayor Frank Catalina
Mayor Theresa Knickerbocker
Daniel Riesel, Esq.

IND224-2

See the responses to comments FA4-1, FA6-5, SA1-12, and SA2-10.

IND225 – Bernard Vaughey

20140929-5245 FERC PDF (Unofficial) 9/29/2014 2:47:40 PM

Bernard Vaughey
215 Broadway
Verplanck, NY 10596-0277
September 29, 2014

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Algonquin Gas Transmission, LLC, Docket No. CP 14-96, AIM project
Noise associated with HDD not adequately addressed

Dear Secretary Bose:

IND225-1 The DEIS as it applies to the noise generated by the HDD operation appears to be flawed. Since noise will have a **significant** impact on the community for the DEIS estimated duration of 5 months, this is unacceptable.

How valid are the figures in Table 4.11.2-4 for the noise quality analysis? **Was the noise study done for the correct location?** Since there is little data to go by on the table, using the east entry 630 foot distance to the closest NSA, it appears the HDD location was MP 3.9, as shown on alignment sheet plates, next to the Hudson River. This was an early proposed HDD exit location. This was also one of the locations for the hydrostatic testing discharge locations.

The DEIS indicates a revision to that location, on the Conceptual HDD plan and profile sheets in Appendix "J". It is now several hundred feet east of MP 3.9. If one were to look at the conceptual HDD plan and profile- page 824 of the electronic version of the DEIS - the HDD exit hole is on an elevated slope, adjacent to and above the homes on the "West End" of Verplanck. The new location is Sta. 44+00 on the plan sheet.

This is **less than half the distance on the DEIS noise analysis tables**, approx. 275 to 300 feet away from the HDD exit location, not the 630 feet in the noise quality analysis. There is little buffer, due to elevation and the clearing required for the operation.

The table 4.11.2-4 in the DEIS needs to be corrected, to the revised location shown in the DEIS. This reduced distance should affect all the estimated noise levels, as noise levels are a function of distance from the source.

Further, where is the documentation to substantiate any of the data reflected on Table 4.11.2-4? How was the noise model built, and with what cumulative factors and what equipment?

Page 1 of 3

IND225-1

See the response to comment LA23-8. The EIS is a summary document of the studies and information reviewed for the Project. Algonquin submitted a revised HDD noise analysis for the Hudson River crossing, which is available for review on the FERC website (www.ferc.gov). FERC staff reviewed this analysis and believes that it adequately characterizes the 24-hour per day HDD activities proposed for this crossing. The EIS states that HDD operations would occur 24-hours per day. Applicable federal, state, and local noise regulations are identified in section 4.11.2.2 of the EIS.

IND225 – Bernard Vaughey (cont'd)

20140929-5245 FERC PDF (Unofficial) 9/29/2014 2:47:40 PM

IND225-1
(cont'd)

Did that noise model factor in noise levels to be generated by the two concurrent HDD or pile (casing) driving operations, as well as the noise from the pipeline string assembly operations? If not, why not?

The first HDD operation, after the area is stripped and prepared, will supposedly be the installation of steel casings, a minimum 60-inch (5 feet) in diameter, to a depth of 90 feet. The DEIS does not give a length, but at the low angle of 6 to 7 degrees proposed, Spectra would need approx. 700 to 750 feet of casing to reach a depth of 90 feet. The DEIS indicates that casing will supposedly be driven or vibrated into the sediment.

For a comparative example, on the new Tappan Zee Bridge, 48-, 60- and 72- inch piles, are being used with very large equipment to drive those piles, vertically, and with very specific requirements on noise and river impact. For the AIM project, the casings to be installed on the Verplanck side will equate to 2 or 3 of those large pipes supporting the new Tappan Zee Bridge. The Rockland would be somewhat similar, but shorter, due to a larger angle. We have no indication as to how long this operation will take, but given the length and the number of splices that will be required, it may be considerable duration. How do we know if this operation was quantified and included in the noise analysis in Table 4.11.2-4? We do not. This is yet another reason why the DEIS is incomplete. **The data for the noise analysis is not included.**

Once the casings are installed, the local community will be subjected to the constant noises related to the drilling and reaming of the HDD hole, with the multitude of high powered equipment, and the noise associated with the assembly of the pipe strings - moving, grinding, welding, testing, coatings, etc. This will also be supplemented by the potential for a cumulative impact of noise from a similar operation on the West shore of the Hudson River.

The DEIS needs to address the level of these noises and duration, as the local codes apply, or indicate if FERC will allow Spectra/Algonquin to ignore the local and New York State codes.

The new Tappan Zee Bridge was recently shut down in Nyack, due to noise issues well above those allowed by any local codes, exceeding limits detailed in the many specification in their NYSTA contract to build the bridge. Those restrictions were likely arrived at in conjunction with discussions and the needs of the local community. That does not appear to have happened here. Why not? Many of the residences in Verplanck will be at a similar distance from the work area, but there are no details of any restrictions of noise or hours.

What are the allowable hours and days of operation for the HDD operations? There needs to be a detailed list, including holiday periods, included in the DEIS to allow for proper review and comment.

Will there be compliance with local and state codes?

IND225 – Bernard Vaughey (cont'd)

20140929-5245 FERC PDF (Unofficial) 9/29/2014 2:47:40 PM

IND225-1 | What are the noise regulations that will be observed and who will test for compliance?
(cont'd)

Who will verify compliance?

All that information, and more, appear to be lacking, and or absent from the DEIS.

This is not acceptable.

IND225-2 | The current DEIS is flawed and should be withdrawn or rejected. At a minimum, we need a
SDEIS to be prepared and circulated, with a STANDARD review period, not the EXPEDITED
review that Spectra has requested for this project.

Thank you.

Bernard Vaughey

Cc:

Assemblywoman Sandy Galef

Supervisor Linda Puglisi

Mayor Theresa Knickerbocker

Daniel Riesel, Esq.

IND225-2 See the responses to comments FA4-1, FA6-5, SA1-12, and SA2-10.

IND226 – Jennifer Lahey

20140929-5253 FERC PDF (Unofficial) 9/29/2014 3:13:24 PM	
<p>Jennifer Lahey, South Salem, NY. To: Kimberly D. Rose, Secretary Federal Energy Regulatory Commission 888 First Street NE, Room 1A Washington, DC 20426</p> <p>Dear Kimberly Rose and Decision Makers at FERC,</p>	
IND226-1	I strongly oppose Spectra Energy's Algonquin Incremental Market (AIM) project, a proposed major expansion of natural gas infrastructure in NY, CT, RI and MA including expanded pipelines, compressor and metering stations. The project is under review by the Algonquin Incremental Market Project, Docket # CP14-96-000.
IND226-2	<p>Emissions: FERC's DEIS does not reflect aggregate (existing and proposed) and cumulative emissions from compressor stations, metering stations, and pipelines in the entire Algonquin Incremental Market (AIM) project.</p> <p>The current emissions will be significantly increased by the expansion of the Southeast and Stony Point compressor stations, and other gas pipeline infrastructure and operations (including but not limited to metering and regulating stations, pipelines, valves, fittings and pigging operations) and the tri-state region including Rockland, Westchester, and Putnam counties is already considered a non-attainment zone for air quality standards according to the U.S. Environmental Protection Agency and exceeds the limits for pollutants such as ground level ozone and particulate matter.</p>
IND226-3	<p>Safety: The National Transportation Safety Board 2014 report identifies pipeline safety as a key issue. The Most Wanted List represents the NTSB's advocacy priorities. It is designed to increase awareness of, and support for, the most critical changes needed to reduce transportation accidents and save lives. A series of most recent catastrophic pipeline ruptures and explosions investigated by the NTSB has brought increased attention to the 2.5 million miles of pipeline that traverse the nation. The consequences can be tragic when safe operational practices are not employed and standards are not implemented.</p> <p>It appears that safety is not a concern of Spectra Energy or FERC (if this project is approved) since the placement of the new 42" pipeline is to be placed within 450 feet of an Elementary School in Verplank. According to a topical report called "A MODEL FOR SIZING HIGH CONSEQUENCE AREAS ASSOCIATED WITH NATURAL GAS PIPELINES" Prepared by Mark J. Stephens of C-FER Technologies, Page 11 shows the Hazard Area Radius by pressure and pipeline size. According to this graph a hazard area would be 825 to 900 feet radius identifying no survivors within that radius. As for the Indian Point Nuclear facility, Algonquin still awaits Entergy's Hazards Analysis and therefore has not made any final conclusion with regard to the safety risk. With using the same chart to properly identify hazard radius it is critical that these studies be</p>

IND226-1 Comment noted.

IND226-2 See the responses to comments SA4-9, LA19-3, and CO12-10.

IND226-3 The commentor inappropriately includes natural gas distribution pipeline mileage data. The proposed Project is a natural gas transmission project. Table 4.12.3-2 of the EIS presents natural gas transmission pipeline incident data based on required reporting to PHMSA. Further, the EIS states that the majority of fatalities from pipelines are due to local distribution pipelines not regulated by FERC, because the pipelines are generally smaller diameter pipes and/or plastic pipes that are more susceptible to damage and often do not have large rights-of-way with pipeline markers. See also the responses to comments FA4-25, SA1-9, FL8-3, and IND71-5.

IND226 – Jennifer Lahey (cont'd)

20140929-5253 FERC PDF (Unofficial) 9/29/2014 3:13:24 PM	
IND226-3 (cont'd)	complete since Indian Point (200 feet away from the proposed new 42" pipeline) is critically close and well within the hazard radius.
IND226-4	Radon: The EPA states that there is no safe limit for human exposure to radon. FERC has continued to reject concerns raised about radon exposure and there is a growing list. Minisink, Spectra Pipeline of Manhattan, and now AIM groups have worked non-stop to bring forward the issue of radon. FERC has yet to address any of these concerns and evaluate safety measures especially for children and pets. The bill, A6863-B, has passed the Health and Assembly Codes committee as of June 2014. Through repeated pressure from grass roots organizations, public hearings were granted and this bill was the direct result. Bill A6863-B relates specifically to the protection of public health from exposure to radon in natural gas and was necessary since our federal government refuses to acknowledge the dangers and ensure proper protection.
IND226-5	Insufficient Analysis of Air Quality and Climate Change: On the subject of climate change, I submit the Physicians Scientists & Engineers (PSE) for Healthy Energy Science Summary March 2014 and draw your attention to the summary: "Relative Climate Impact" states "a transition to gas would require 100 years or more to achieve just 25% reduction in warming". And "conversion to natural gas will exacerbate climate change".
IND226-6	Due to the many unresolved issues on the AIM Project I firmly request FERC deny any and all permits. The "NO BUILD" option is the only option. FERC must reject this insane proposal for pipeline expansion and move forward with sustainable energy infrastructure. This is the ONLY way to proceed from this point forward. There is nothing else that matters more. Thank you.

IND226-4 See the response to comment SA4-4.

IND226-5 See the responses to comments CO12-13 and CO14-55 for additional information regarding GHG impact assessments prepared for the Project.

IND226-6 Comment noted.

IND227 – Gary Chiprout

20140929-0013 FERC PDF (Unofficial) 09/29/2014

ORIGINAL

FILED
SECRETARY OF THE
COMMISSION
Peekskill, New York
September 3, 2014 SEP 29 A 11:38
FEDERAL ENERGY
REGULATORY COMMISSION

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1
Washington, DC 20426

RE: Algonquin Incremental Market ("AIM") Project:
FERC Docket No. CP 14-96-00

Dear Secretary Bose:

Please accept the following comments on the Draft Environmental Impact Statement ("DEIS") for the proposed Algonquin Incremental Market ("AIM") pipeline expansion project (the "Pipeline"), particularly as it affects Westchester and Putnam counties in New York State. I urge the Federal Energy Regulatory Commission ("FERC") to withdraw the DEIS and take no further action on the application until all of the matters included in these comments are addressed in a revised DEIS.

IND227-1 Since the original pipeline was built near my house in Buchanan, the Indian Point nuclear power plant was built. There is also Wheelerboro nearby, which burns plastics to generate electricity. Two years ago there was a lightning strike there, and for two months we were subjected to horrible noises day and night because they had to vent stuff into the air.

IND227-2 accidents do happen. This area has suffered enough because of energy companies. As the voice of the ordinary citizen, I implore the Federal Energy Regulatory Commission to regulate the fossil fuel companies in the best interests of the entire population. There is no necessity to expand this gas line. Gary Chiprout

IND227-1

See the response to comment FA4-25. Noise impacts associated with the Project are discussed in section 4.11.2 of the EIS.

IND227-2

Section 1.1 of the EIS discusses the purpose and need for the Project.

IND228 – Bernard Vaughey

20140929-5249 FERC PDF (Unofficial) 9/29/2014 2:53:12 PM	
	Bernard Vaughey 215 Broadway Verplanck, NY 10596-0277 September 29, 2014
	Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street NE, Room 1A Washington, DC 20426
	RE: Algonquin Gas Transmission, LLC, Docket No. CP 14-96, AIM project Impacts on Saint Patrick's church are not addressed
	Dear Secretary Bose:
IND228-1	The DEIS comment period ends in <u>under 12 hours</u> , and issues regarding Saint Patrick's church in Verplanck have still not been addressed. <u>When exactly will the public, The Archdiocese of New York, and the parishioners of Saint Patrick's church have the opportunity to comment on the effects this project will have on St. Patrick's Church?</u>
	In the DEIS, FERC made the following recommendation on page 4-154: To ensure that impacts on the church are minimized and reduced to less than significant levels, <i>we recommend that: Prior to the end of the draft EIS comment period, Algonquin should file with the Secretary a site-specific construction plan for St. Patrick's Church.</i> <i>The plan should be developed in consultation with the church leadership and include:</i> <i>a. details on the location of church facilities relative to the proposed construction activities;</i> <i>b. a description of the construction activities that would occur at the site;</i> <i>c. the timing of construction activities (i.e., days of the week and hours of the day);</i> <i>d. specific measures that would be implemented to minimize conflicts with parishioners; and</i> <i>e. documentation of consultation with St. Patrick's Church officials.</i>
IND228-2	Not included in these recommendations, but begging attention, is how Spectra and FERC will address local laws and how they relate to noise-sensitive zones. How will this project address the
Page 1 of 2	

IND228-1

See the responses to comments FA4-1 and SA1-8.

IND228-2

Applicable federal, state, and local noise regulations are identified in section 4.11.2.2 of the EIS. See also the responses to comments FA4-1, FA6-5, SA1-8, SA1-12, and SA2-10.

IND228 – Bernard Vaughey (cont'd)

20140929-5249 FERC PDF (Unofficial) 9/29/2014 2:53:12 PM

IND228-2
(cont'd)

creation of unnecessary noise exceeding the non-construction ambient noise levels from their activities adjacent to St. Patricks' church?

Will all Spectra/Algonquin pipeline construction activities in the vicinity cease during masses, funerals and all other religious church-related activities?

The current DEIS should be withdrawn or rejected. At a minimum, we need a SDEIS to be prepared and circulated, with a STANDARD review period, not the EXPEDITED review that Spectra has requested for this project.

Thank you.

Bernard Vaughey

Cc:

Supervisor Linda Puglisi
Mayor Theresa Knickerbocker
Daniel Riesel, Esq.

IND229 – Cherie Ingraham

20140929-5272 FERC PDF (Unofficial) 9/29/2014 3:36:50 PM

Cherie Ingraham, Brewster, NY.
To Whom It May Concern:

IND229-1 I am opposed to the proposed expansion of the Algonquin Pipeline. I am a resident of the Town of Southeast New York where one of the compressor stations is located.

IND229-2 I am concerned about toxic emissions, possible accidents and explosions that could result from doubling the size of the already existing pipeline. This is a quality of life concern not only for humans but for plants, animals and the water supply of 9 million people. This proposal is another disruption to our fragile already failing ecosystem.

IND229-3 The proximity of Indian Point is a huge concern for all inhabitants of the tri state area and beyond. Gas and nuclear energy together could have a devastating impact on our existence.

IND229-4 We as responsible citizens should be looking at the many alternative, sustainable environmentally friendly energy resources which are available to us. Restoring balance to our environment at this time is crucial to our existence here on Earth. This is a time in our history when the Earth and her inhabitants should be considered first instead placing the potential profits that a few companies may make ahead of the health and welfare of All That Is.

Respectfully Submitted,
Cherie Ingraham

IND229-1 Comment noted.

IND229-2 Section 4.12.1 of the EIS discusses federal safety standards for natural gas pipelines and how these standards are applied in HCAs. Section 4.12.3 of the EIS discusses safety-related concerns and other specific measures that Algonquin has proposed or that we are recommending to further address public safety concerns. Air emissions associated with the Project are discussed in section 4.11.1 of the EIS.

IND229-3 See the response to comment FA4-25.

IND229-4 See the response to comment FL2-2.

IND230 – Susan McDonnell

20140929-5281 FERC PDF (Unofficial) 9/29/2014 3:40:06 PM

The DEIS reads more like a “to do list” than a document outlining actions and backing up that outline with solid researched information. The studies listed have not been done and the information in many places is fractured or missing or incomplete. I.e.

IND230-1 | *the studies not done of the disturbance possible in the NYS watershed is crucial for the drinking water for NYC.

IND230-2 | *comments on the insurance for homeowners is based on a study on 2008 when the economy was in bad shape rather than the more recent study dated 2011

- how wide will the trenches be to accommodate the 42in pipe, if you are a homeowner on the pipeline that is significant information
- approximately how long will the process take?

Just to name a few.

IND230-3 | The population of Northern Westchester County has increased significantly since the first pipes were installed in the 1950s and even more than the additional installations in the 1960s.

IND230-4 | The DEIS does not address that life span of the pipes or the fact that historically pipeline last approximately 50 years. One pipeline is beyond its life and the second one is just about there. So if you plan to replace one old pipe when will you come back and need to replace the other one that is at its life's end? Do we have to go through this again soon?

IND230-5 | There are some safety issues that have been raised and still need to be addressed.

The pipeline was in place when the Indian Point Nuclear plant was

The interior cut off controls for Indian point:

The safety requirement for class four line as not being followed. SAFETY Indian Point Nuclear Power plant is located in a community that was in existence at the time it was built.

The pressure coming through the pipes around Indian point will be higher the standards being used according to the DEIS are not the highest.

IND230-1 See the response to comment SA14-1.

IND230-2 See the response to comment IND85-51 regarding insurance. Section 2.3 of the EIS describes the construction methodology and steps and section 2.4 identifies the overall schedule for the Project. See also the response to comment IND139-5.

IND230-3 Comment noted. Economic impacts associated with the Project, including selected demographic and socioeconomic conditions for the communities that would be affected by the proposed Project are discussed in section 4.9.1 of the EIS.

IND230-4 The need to replace aging pipelines is determined by Algonquin's pipeline integrity program, which is subject to federal regulations and discussed in section 4.12.1 of the EIS. Within such programs, the condition of the pipe is regularly monitored. Pipe replacements can also be driven by class location changes, for instance, when the number of dwellings in the immediate vicinity of the pipeline increases above certain thresholds after the line is put into service. As a result, the exact timing of when pipe replacements may be necessary is difficult to predict. See also the response to comment IND215-4.

IND230-5 See the response to comment FA4-25.

IND230 – Susan McDonnell (cont'd)

20140929-5281 FERC PDF (Unofficial) 9/29/2014 3:40:06 PM

IND230-6 The members of our group SAPE2014 and the people who have volunteered to help us have spent many, many hours reading and discussing this DEIS and we find it inadequate in almost all areas. Also researched for the DEIS seems to be narrowly defined. For instance are you aware that there is also a 1000kw electric power line planned for the same piece of and that SPECTRA will need.

IND230-7 Are you aware that the shot off valves that would shut down the gas flow in case of an accident in the pipeline were removed some time ago? Your DEIS discusses the automatic shut down in Huston if there is a problem in NY. That might work, if a bit slowly, if there is power to contact Huston to shut down the pipeline>

IND230-8 Issues with FERC for comment:

IND230-9 Indian point lacking shut off valves

IND230-10 Incomplete DEIS makes DEIS read like a 'to do list' rather than a plan

IND230-11 In accuracies run through many of your documents. In Constitution Pipeline the issue of the difference between verge space and deep woods converted to verge space by pipeline digging. You have heard from the hunters in upstate new York about this.

IND230-12 Your people profess to be ignorant of the proposed high voltage electrical line passing through Buchanan, NY and around the Indian Point Nuclear Power plant. Really!!! Well that is a PSC project and I guess you don't talk with them!

IND230-13 All of this planning for transporting natural gas, a fossil fuel, rather than getting into the business of green energy production and transportation. I realize you are supported by the Gas and Oil industry but it seems that you are several steps behind the thinking and wishes of the American people, people around the world and the current research into Climate Change.

IND230-14 From letter fro SG to FERC re:scope of project, i.e. Atlantic Bridge etc. assessments flawed as well. It does not appear that Spectra/Algonquin is revealing the ultimate scope of their planned system upgrades.

IND230-6 The comment lacks the detail necessary to determine which 1,000 kilowatt power line is being referenced but we assume it pertains to either the proposed Champlain Hudson Power Express Project, which crosses the Stony Point to Yorktown Take-up and Relay at MP 3.3, or the West Point Transmission Project, which crosses the Stony Point to Yorktown Take-up and Relay at MP 3.9. These projects are identified and included in our evaluation of cumulative impacts in section 4.13 of the EIS.

IND230-7 Mainline valves on the existing or new pipeline must be designed, installed, and operated in compliance with PHMSA rules.

IND230-8 Comments noted.

IND230-9 See the responses to comments FA4-25 and IND230-7.

IND230-10 See the response to comment FA4-1.

IND230-11 The comment lacks the detail necessary to identify the alleged inaccuracy. Impacts on forested land are discussed in section 4.5.4 of the EIS.

IND230-12 See the response to comment IND230-6.

IND230-13 Comment noted. The FERC is responsible for reviewing applications from natural gas transmission companies seeking authorization to construct and operate interstate natural gas facilities. The FERC does not regulate the siting of "green energy" projects such as wind or solar energy collection farms, nor the development or regulation of energy conservation programs.

IND230-14 See the response to comment FA3-5.

IND230 – Susan McDonnell (cont'd)

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IND230-14
(cont'd) | Segmentation of the line

IND230-15 | inadequate as a National Environmental Policy Act document, and we urge the Commission not to further consider the proposed Project for approval until each of the deficiencies and omissions identified in Section 5.5 of the DEIS is completed and made available for review and public comment. Additionally, we request a minimum of a ninety day public comment period upon release of a fully complete Supplemental Draft Environmental Impact Statement.

IND230-15 See the responses to comments FA4-1, FA6-5, and SA1-12.

IND231 – Sosina Makonnen

20140929-5284 FERC PDF (Unofficial) 9/29/2014 3:48:29 PM	
IND231-1	Sosina Makonnen, Peekskill, NY. My name is Sosina Makonnen. I am a resident of Peekskill and a mother whose child is about to start kindergarten at Buchanan-Verplank (B-V) Elementary school the fall of 2015. The proposed new pipeline, replacing an existing 26-inch diameter pipeline with 42-inch diameter pipeline will pass within in 450ft of the school (B-V) and my home. I have grave concern for the safety of my child my family as well as my community. What makes me nervous even more is that most of our concerns are not being addressed.
IND231-2	1. Will Algonquin commission conduct an independent and transparent risk-analysis study to determine the risks to a school in such close proximity to 42-inch high-pressure natural gas pipeline and Indian Point? Publications (Transmission Pipelines and Land Use, from National Research Council) have shown that allowing this pipeline in such close proximity could potentially be a catastrophic. High Consequence Area (HCA) for Algonquin Pipeline is 844.9ft on either side of the pipeline. B-V Elementary school is ONLY 450ft from pipeline, well within HCA. A rupture with in 450ft distance results in mortality rate of 100% within 90 seconds for unsheltered individuals, such as children playing on the B-V playground. Surely you see our concerns, who wants this in their schools and neighborhood?
IND231-3	2. Will Algonquin finance an independent health risk assessment for the district? This Project will cause a significantly greater amount of combustible natural gas to flow through the infrastructure, thereby presenting greater risk of hazard. Will pollutants in the old pipes being removed (radon, lead, and other compounds known to be in natural gas) be released? What is the plan to address this? What are the strategies to address our concerns? so we parents/residents won't feel like our homes and neighborhood are dumping field for expensive project?
IND231-4	3. Will Algonquin/Spectra Energy carry enough insurance to cover loss of life & property? Who is their insurance carrier? Having read that Spectra Energy has had twenty-one incidents since 2006 for \$8,564,246 in property damage according to PHMSA is extremely disturbing and highly alarming. What are the penalties/fines will be imposed on Algonquin/Spectra to pay for non-compliance of maintenance of new and existing pipelines? Inadequate pipeline regulation and oversight and Spectra's history of safety issues amplifies the serious threat posed by this proposal to public health, safety, water and food supplies, and the economy.
IND231-5	4. Will Algonquin and/or relevant permitting agencies inform the District when gas flow will begin and when blow downs at local metering and compressor station. Will the district be forced to update any emergency response or evacuation plans in the light of this work and the likelihood of road closures? Is Spectra/Algonquin prepared to finance any necessary changes (sound proofing, windows etc.) any changes the district must make to accommodate their project or will the expense fall to tax payers?

IND231-1 See the responses to comments SA1-9 and SA4-5.

IND231-2 See the responses to comments FA4-25 and SA1-9.

IND231-3 Algonquin's proposed construction methods associated with the take-up and removal of the existing pipeline are described in section 2.3.1.2 of the EIS. The potential to encounter hazardous waste and Algonquin's plan to handle and dispose of these wastes is described in several sections of the EIS, including sections 4.2.1.5, 4.2.2.6, 4.3.1.7, 4.3.2.6, 4.6.1.4, and 4.8.6.1. See also the responses to comments SA4-4 and CO14-25.

IND231-4 See the responses to comments LA1-10, FL4-4, CO14-25, and IND84-15.

IND231-5 See the responses to comments SA1-9, SA4-3, FL8-2, IND84-5, and IND84-9.

IND231 – Sosina Makonnen (cont'd)

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IND231-6 | We are very concerned to what's about to transpire in and to our neighborhood/school and would like to get all our elected officials to hear and address our concerns as if this was happening in your neighborhood and to your kids schools.

Sosina Makonnen

IND231-6

Comment noted.

IND232 – Bernard Vaughey

	<p>Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street NE, Room 1A Washington, DC 20426</p>	<p>Bernard Vaughey 215 Broadway Verplanck, NY 10596-0277 September 29, 2014</p>
IND232-1	<p>RE: Algonquin Gas Transmission, LLC, Docket No. CP 14-96, AIM Project Hydrostatic testing questions</p> <p>Dear Secretary Bose:</p> <p>FERC reviewed and issued the DEIS on August 6, 2014. Included in that DEIS was information related to required Hydrostatic Testing, with estimated volumes (gallons) of water and discharge points listed in table 4.3.2-4.</p> <p>Three weeks prior to the issuance of the DEIS, Spectra/Algonquin on July 15, 2014 filed paperwork to NYSDEC with different discharge points located. This paperwork was filed with FERC on September 2, 2014, almost 1 month after the DEIS was issued.</p> <p>Which discharge points are to be commented on? The locations that are in the DEIS, or the locations that should have been in the DEIS?</p> <p>Has the Stony Point to Yorktown segment been reduced from 6 discharge locations to only 4?</p> <p>The new July 15, 2014 letter the NYSDEC letter Verplanck site, is now at MP 4.1. MP 3.9 at the rivers edge is no longer shown. Is the discharge point at MP 4.1 for the HDD operation, the new 42 inch pipeline, or both?</p> <p>Assuming the answer is both, how much is the expected discharge volume for each phase or operation and where will that discharge run? Will that discharge flow To the River or the quarry and then the river? Where will the discharge points be, as there will be no vegetate area left on this site, within the proposed AIM ROW.</p>	

IND232-1

The EIS had been revised to include the most recently filed information on discharge locations, per the September 2, 2014 filing with the NYSDEC. Hydrostatic test water would be discharged into well vegetated, stabilized areas and situated and designed in a way to prevent sedimentation in water resources or degradation of water quality. There are currently four hydrostatic test fill/dewatering locations proposed along the Stony Point to Yorktown Take-up and Relay segment of the Project; however, the exact number of dewatering structures and amount of volume expected to be discharged at each site is not known at this time. More specific information (including site-specific drawings) would be included in the final SWPPP. The flow of 1,000 to 1,200 gallons per minute is how quickly the water would go into the dewatering structure and would appear similar to filling a small swimming pool. Water would leave the dewatering structure at a much slower rate. See also the response to comment SA14-1.

IND232 – Bernard Vaughey (cont'd)

IND232-1 (cont'd)	<p>The DEIS, page 4-49, indicates:</p> <p>“ the water would be discharges into dewatering structures located in upland areas and within the construction work area in accordance with Algonquin’s E&SCP. The discharge rate would range between 1,000 and 1,200 gpm and would be regulated to maintain proper function of the dewatering structure. The majority of this water would infiltrate the soil and recharge the local groundwater system. NYSDEC requested that Algonquin comply with the hydrostatic testing best management practices provided to them by NYSDEC. Algonquin would follow the procedures outlined in the E&SCP.”</p> <p>The entire quarry site is <u>compacted</u> fine stone dust, byproduct from the quarry operations, which does not drain well, if at all. There is a minimal amount of soil that has developed over the years, over the stone dust, to support any vegetation that can survive these conditions. The HDD operation and the 42 inch pipe installation will likely strip the proposed right of way of most, if not all, of the existing vegetation and topsoil. The pullback area will strip that additional area of vegetation. West Point Partners, as proposed for work in 2015/2016, will be removing additional vegetated areas with their substation and cable installations areas.</p> <p>So please provide the exact proposed location of the upland areas, the vegetated upland areas, within the ROW, where these dewatering structures will be located? How many structures will be needed for a flow of 1000 to 1200 gallons per minute?</p> <p>What does 1000 to 1200 gallons per minute equate to, in layman’s terms? Would it be what one would see if an 8 inch water main was to rupture?</p>
IND232-2	<p>What is the statement “<i>The majority of this water would infiltrate the soil and recharge the local groundwater system</i>” based upon? The bulk of the quarry property, as mentioned above, is covered by stone dust, including the proposed work areas. Where will those many hundreds of thousands of gallons of water go?</p> <p>There is erosion of the existing stone dust material throughout the property, once disturbed, just from simple rainfall. Is it reasonable to expect that with the volumes of water released, in a short period of time will not aggravate that situation and lead to silt on adjacent properties, in drainage systems (which empty directly to the river), or the quarry, which also empties into the river?</p>
IND232-3	<p>None of these cumulative impacts are shown or addressed in the DEIS or the July 15, 2014 documents to NYSDEC. This needs to be addressed for further review and comment.</p>
IND232-4	<p>AS for the discharge water, the pipe will be new, but not without scale, rust, welding byproducts and other materials. Sampling of the discharge water will be in accordance with Algonquin’s E&SCP. What exact section(s), and where can that document be found in AIM filings? When will the sampling and related testing be performed? Will it be before, during or after the discharge? If during or after discharge, how does Spectra correct an unacceptable situation, as the discharge will likely be completed prior to the results being known?</p>

IND232-2

See the response to comment IND232-1.

IND232-3

The potential cumulative impacts associated with the AIM Project and other projects are evaluated in section 4.13 of the EIS. Specific information regarding the locations of proposed hydrostatic water discharges and the potential impacts including erosion and the secondary effects of erosion are addressed in sections 4.2.1.1, 4.3.2.5, and 4.3.2.6 of the EIS. See also the response to comment IND232-1.

IND232-4

Algonquin's E&SCP was included as appendix 1B to Resource Report 1 in its February 28, 2014 application (Accession No. 20140228-5269). EIS would sample and test the source water and discharge water in accordance with permit requirements.

IND232 – Bernard Vaughey (cont'd)

IND232-4
(cont'd)

This is **NOT** a typical situation for a locations such as MP 4.1 as shown in the NYSDEC July 15, 2014 filing. It would also be an issue for the original MP 3.9 and 5.5 locations. Discharge rates of 1000 to 1200 gallons per minute, flowing for hours at a time, The HDD is 284,000 gallons – half is 142,000 gallons. At the lower rate, the discharge lasts for 142 minutes, almost 2 ½ hours.

The pipeline is over 4.6 million gallons and with the NYSDEC filing, with 4 discharge points, 2 being at ends. Without specifics, using one quarter as a factor, that is over 1.1 million gallons average, but probably higher as there are 2 points at ends. To discharge 1,100,000 gallons, at the lower discharge rate, that discharge lasts for 1,100 minutes, or over 18 hours.

The local community needs specific information, to determine the effects, so it will NOT erode the soil and potential carry the slurry into the quarry, which spills into the river, or into yards, streets and the river, or in culverts and the river. Spectra has indicated a discharge from the pipe at MP 4.1, but there will the actual discharge structures be? i

Spectra needs to show the limits of their work, how much area will be disturbed, the limits of the WPP proposed work, and then show SPECIFICALLY what well vegetated stabilized area is actually left intact, within the Right of way, or where they propose to effect the discharge.

Spectra needs to provide the locations of the unspecified upland areas where the dewatering structures will be located.

For the table as indicated in the DEIS, all of the same issues apply as well as others.

In Table 4.3.2-4, page 4-51 of the DEIS, Spectra proposes to draw approx. 285,000 gallons of water from the quarry lake. The discharge that quantity is shown as at MP 3.2 and 3.9, the Entry / exit locations on some drawings for the Hudson HDD, so that water would presumably go back into the river. Where is that vegetated discharge area? .

The same table indicates over 4.6 million gallons will come from the same quarry and municipal water sources, for discharge at 6 locations, including MP 3.2, 3.9, 5.5 and 12.3.

Buchanan – MP 5.49 is adjacent to Bleakly Ave, at the bottom of multiple slopes. Where is it water to drain? Does Spectra propose into the nearby clay hole and wetland? Or is it the existing municipal drainage into Dickey brook? How much of the 4.6 million gallons would be discharged at this location?

What is the current flow of Dickey Brook? What percentage would it be increased by?

There are too many unanswered questions and issues for this DEBE to be acceptable as presented.

IND232 – Bernard Vaughey (cont'd)

IND232-5

The current DEIS should be withdrawn or rejected. At a minimum, we need a SDEIS to be prepared and circulated, with a STANDARD review period, not the EXPEDITED review that Spectra has requested for this project.

Thank you.



Bernard Vaughey

Cc:

Supervisor Linda Puglisi

Mayor Theresa Knickerbocker

Daniel Riesel, Esq.

IND232-5

See the responses to comments FA4-1, FA6-5, SA1-12, and SA2-10.

IND232 – Bernard Vaughey (cont'd)

20140806-4001 FERC PDF (Unofficial) 08/06/2014

Only two of the waterbodies listed in table 4.3.2-2 contain fisheries of special concern. Susquehanna Brook crossed by the E-1 System Lateral Take-up and Relay segment in Connecticut is considered a warmwater fishery, and the Unnamed Tributary to Stony Brook crossed by the E-1 System Lateral Loop segment is considered a coldwater fishery (see section 4.6.2). None of the other waterbodies that may require blasting are considered sensitive.

4.3.2.4 Extra Workspaces Within 50 Feet of Waterbodies

The FERC's Procedures stipulates that all ATWS should be located at least 50 feet from waterbodies except where an alternative measure has been requested by Algonquin and approved by the FERC. Algonquin identified certain areas where they believe site-specific conditions do not allow for a 50-foot setback of ATWS from waterbodies. Table 4.3.2-3 identifies the locations and the reasons why Algonquin believes the ATWS is justified. Based on our review, we concur that all of Algonquin's requests are justified.

4.3.2.5 Hydrostatic Test Water

Algonquin would verify the structural integrity of the piping associated with the Project facilities before placing them in service by conducting hydrostatic testing. Testing would be completed by capping installed pipe segments with test manifolds, filling these segments with water, pressurizing the water, then checking for pressure losses due to pipeline leakage. The integrity of the piping at aboveground facilities would also be hydrostatically tested. Algonquin estimates a need for a total of about 10,082,645 gallons of water to conduct the hydrostatic testing of pipeline segments and aboveground facilities. Of this total, about 9,610,245 gallons would be for testing pipeline segments and 472,400 gallons would be for testing aboveground facilities. The estimated hydrostatic test water requirements for each facility are listed in tables 4.3.2-4 and 4.3.2-5. Following testing, all test water would be discharged into dewatering structures located in upland areas and within the construction work area at a rate of 1,000 to 1,200 gpm in accordance with Algonquin's E&SCP and all applicable permits. Samples of the discharge water would be collected and tested in accordance with federal and state permit requirements.

The Hudson River HDD and the Interstate 84/Still River HDD pipe segments would be hydrostatically tested before and after the HDD pull back activities are completed. The other pipeline segments would be hydrostatically tested in one section, with the exception of the Stony Point to Yorktown Take-up and Relay and West Roxbury Lateral segments, which would be tested in two sections.

Following testing of the pipeline, the water would be discharged into dewatering structures located in upland areas and within the construction work area in accordance with Algonquin's E&SCP. The discharge rate would range between 1,000 and 1,200 gpm and would be regulated to maintain proper function of the dewatering structure. The majority of this water would infiltrate the soil and recharge the local groundwater system. NYSDEC requested that Algonquin comply with the hydrostatic testing best management practices provided to them by NYSDEC. Algonquin would follow the procedures outlined in the E&SCP.

IND232 – Bernard Vaughey (cont'd)

20140806-4001 FERC PDF (Unofficial) 08/06/2014

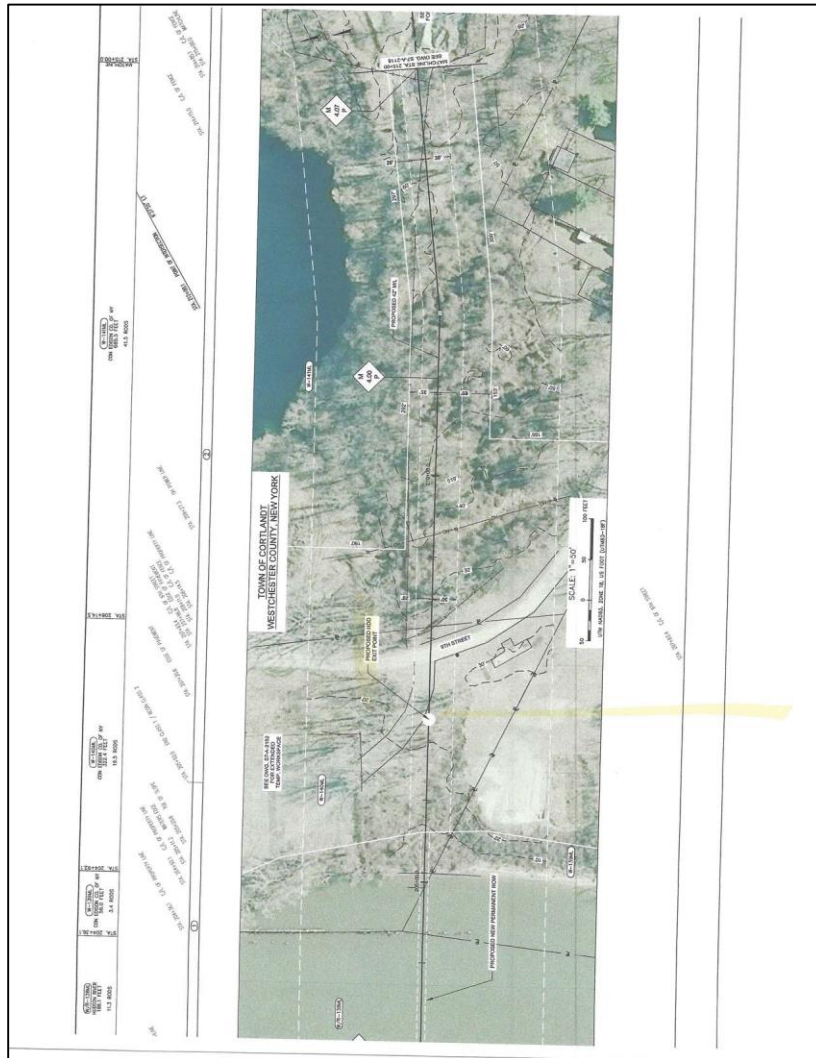
TABLE 4.3.2-4 Potential Hydrostatic Testing Water Sources for Pipeline Facilities for the AIM Project			
State, Facility	Estimated Volume (gallons)	Water Source	Discharge (MP)
New York			
Haverstraw to Stony Point Take-up and Relay	1,242,537	Municipal	0.0/3.3
Stony Point to Yorktown Take-up and Relay	4,677,562	Municipal/ Old Verplanck Quarry Lake	0.0/2.6/3.2/3.9/5.5/12.3
Hudson HDD*	284,985	Old Verplanck Quarry Lake	3.2/3.9
Southeast to MLV 19 Take-up and Relay	56,997	Municipal	0.0
Connecticut			
Southeast to MLV 19 Take-up and Relay	1,614,918	Municipal	1.5/2.2/4.4
Interstate 84/Sill River HDD*	266,385	Municipal	1.5/2.2
Line-36A Loop Extension	558,339	Municipal	0.0/2.0
E-1 System Lateral Take-up and Relay	501,816	Municipal	0.0/9.1
E-1 System Lateral Loop Extension	40,324	Municipal	0.0/1.3
Massachusetts			
West Roxbury Lateral	336,382	Municipal	0.0/4.3/5.1
TOTAL PIPELINE FACILITIES	9,610,245		

* HDD sections would be tested immediately after installation. These sections may additionally be tested with the mainline.

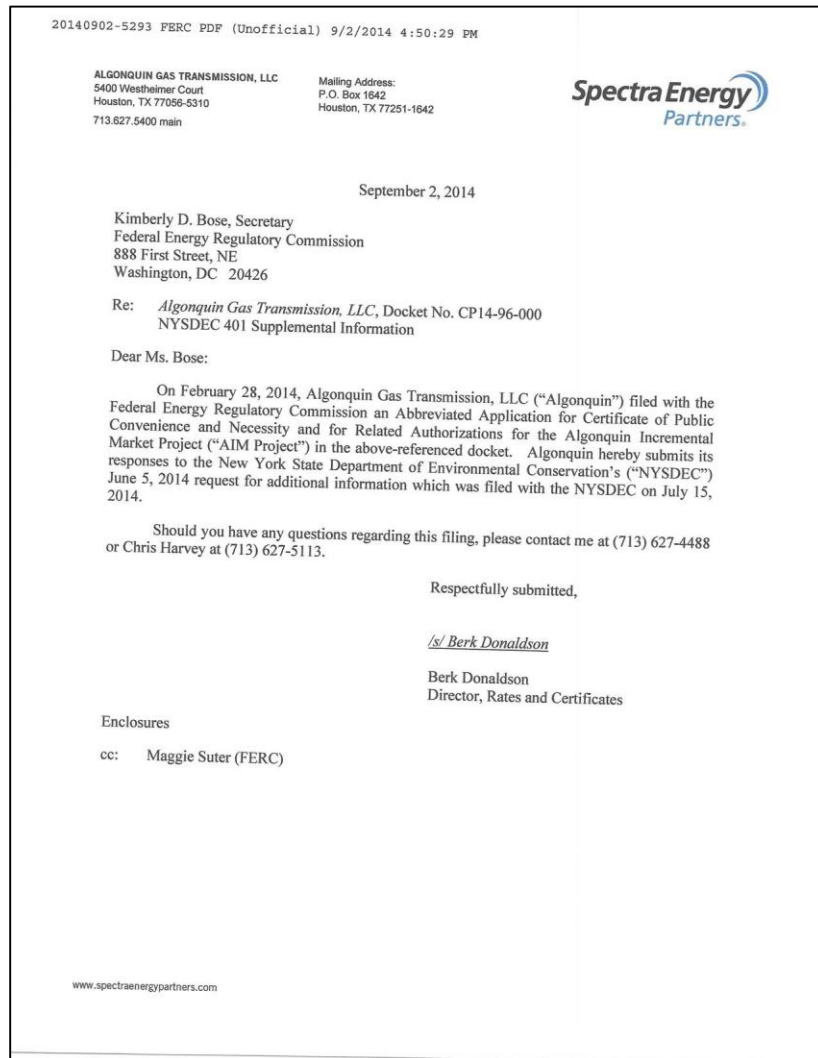
TABLE 4.3.2-5 Potential Hydrostatic Testing Water Sources for Aboveground Facilities for the AIM Project*			
State/Facility	Estimated Volume (gallons)	Water Source	Discharge
New York			
Stony Point Compressor Station	351,000	Municipal	On site
Southeast Compressor Station	22,000	Municipal	On site
M&R Stations (total of 3)	800	Municipal	On site
Connecticut			
Cromwell Compressor Station	35,000	Municipal	On site
Chaplin Compressor Station	33,500	Municipal	On site
M&R Stations (total of 14)	5,600	Municipal	On site
Rhode Island			
Burrillville Compressor Station	20,500	Municipal	On site
Massachusetts			
M&R Stations (total of 10)	4,000	Municipal	On site
TOTAL ABOVEGROUND FACILITIES	472,400		

* M&R station facilities and/or certain equipment at these facilities may be tested pneumatically.

IND232 – Bernard Vaughey (cont'd)



IND232 – Bernard Vaughey (cont'd)



IND232 – Bernard Vaughey (cont'd)

20140902-5293 FERC PDF (Unofficial) 9/2/2014 4:50:29 PM

Algonquin Gas Transmission, LLC
DEC ID #3-9903-00099/00002, 3, & 4
FERC Docket Nos. PF13-16-000 / CP14-96-000
Response to NYSDEC 401 WQC Environmental Data Request
Dated June 5, 2014

ENVIRONMENTAL DATA REQUEST

A copy of Algonquin's Conceptual Wetland Mitigation Plan as filed with the U.S. Army Corps of Engineers is included in Attachment A – Response 2. Algonquin appreciates that the NYSDEC will be party to any mitigation approach and looks forward to receiving any comments. Algonquin continues to evaluate potential forested wetland restoration opportunities and would appreciate any suggestions from NYSDEC.

3. The narrative states that approximately 6.6 million gallons of water will be needed to test the pipeline and the above ground facilities. NYSDEC would like additional and details about the hydrostatic testing. The current narrative states that the location will be outside of wetlands and riparian areas to the extent practicable and the test water will be discharged to well vegetated stabilized area if practical. This statement does not go far enough to ensure that impacts will be avoided. 6.6 million gallons is a significant amount of water, therefore NYSDEC would like to see a map which depicts where the discharge points will be located. This information is needed in order for NYSDEC to be able to assess if the extra 1,000 - 1,200 gal/min of water will cause impacts to the resources.

Response 3

The hydrostatic testing dewatering locations will be located outside of wetlands and riparian areas. Mapping that depicts the fill/discharge locations is provided in Attachment A – Response 3. Hydrostatic testing water will be discharged into well vegetated stabilized areas. These dewatering locations will be situated and designed in such a way to prevent sedimentation in water resources or degradation of the water quality in water resources. Typical designs for hydrostatic testing dewatering structures are also provided in Attachment A – Response 3.

4. The plans indicate a number of *trench dewater structures*. However no typical design has been provided. Please provide NYSDEC a typical design for these structures.

Response 4

A typical design for the proposed trench dewatering structures is provided in Attachment A – Response 4. An alternative trench dewatering structure that includes a geotextile floor surrounded by at least one row of staked hay bales installed around the perimeter of the filter bag dewatering location will be employed to provide additional filtration if the Environmental Inspector determines the performance of the filter bag dewatering structure alone is not adequate.

PROTECTION OF WATERS COMMENTS

1. Cedar Pond Brook - Class C (TS) (B13-RLR- S10)
 - The plan lacks a location for the dewatering of the trench on the west side of Cedar Flags Road

AIM Project NYSDEC Data Request

June 2014

IND232 – Bernard Vaughey (cont'd)

20140902-5293 FERC PDF (Unofficial) 9/2/2014 4:50:29 PM

Algonquin Gas Transmission, LLC
DEC ID #3-9903-00099/00002, 3, & 4
FERC Docket Nos. PF13-16-000 / CP14-96-000
Response to NYSDEC 401 WQC Environmental Data Request
Dated June 5, 2014

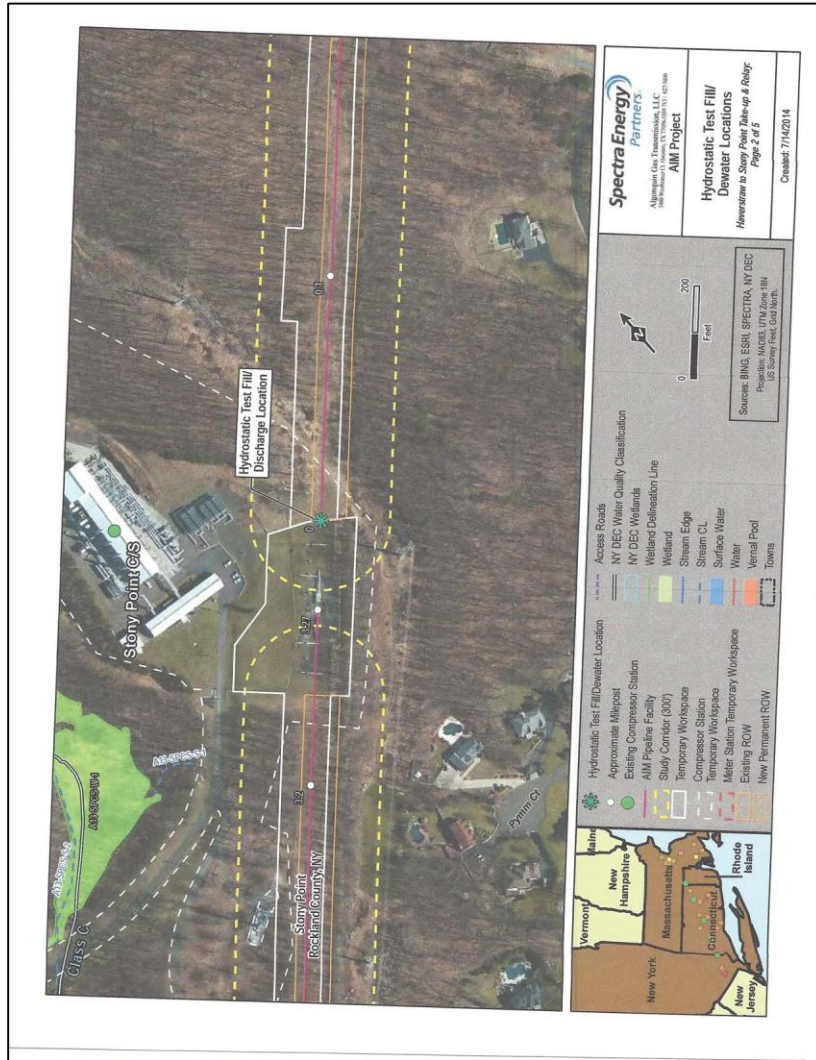
ENVIRONMENTAL DATA REQUEST

Attachment A – Response 3

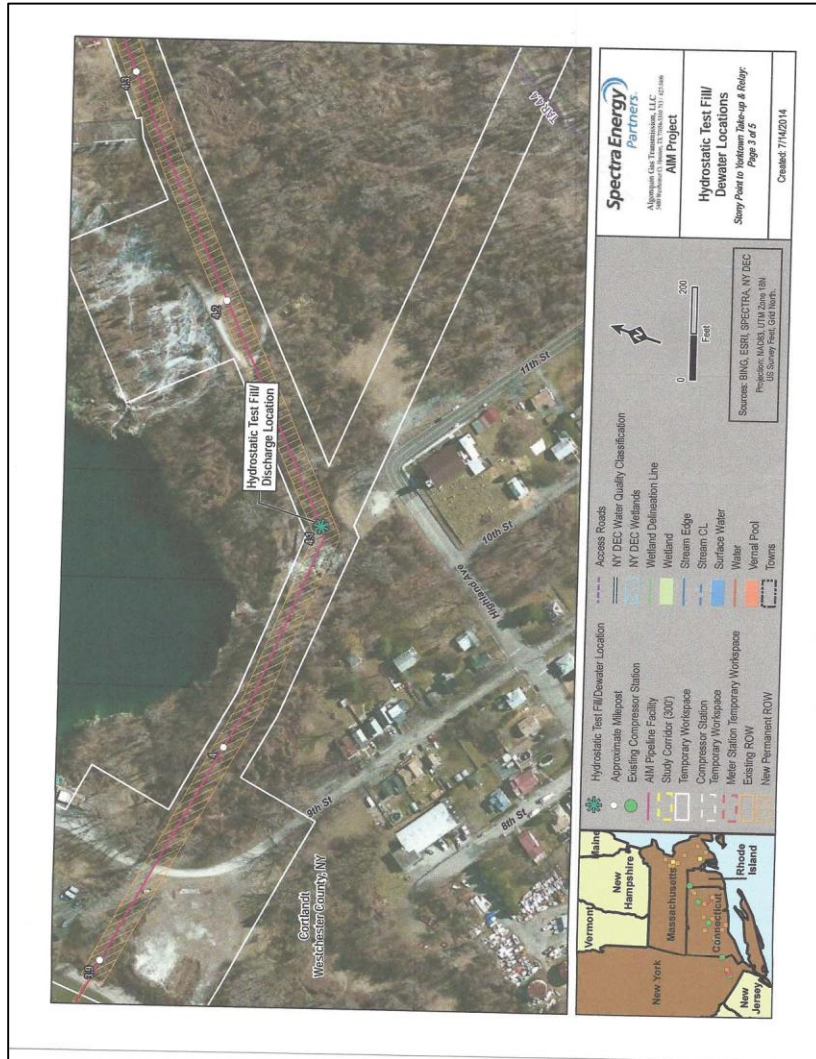
Hydrostatic Testing Fill/Discharge Locations and Typicals

AIM Project NYSDEC Data Request June 2014

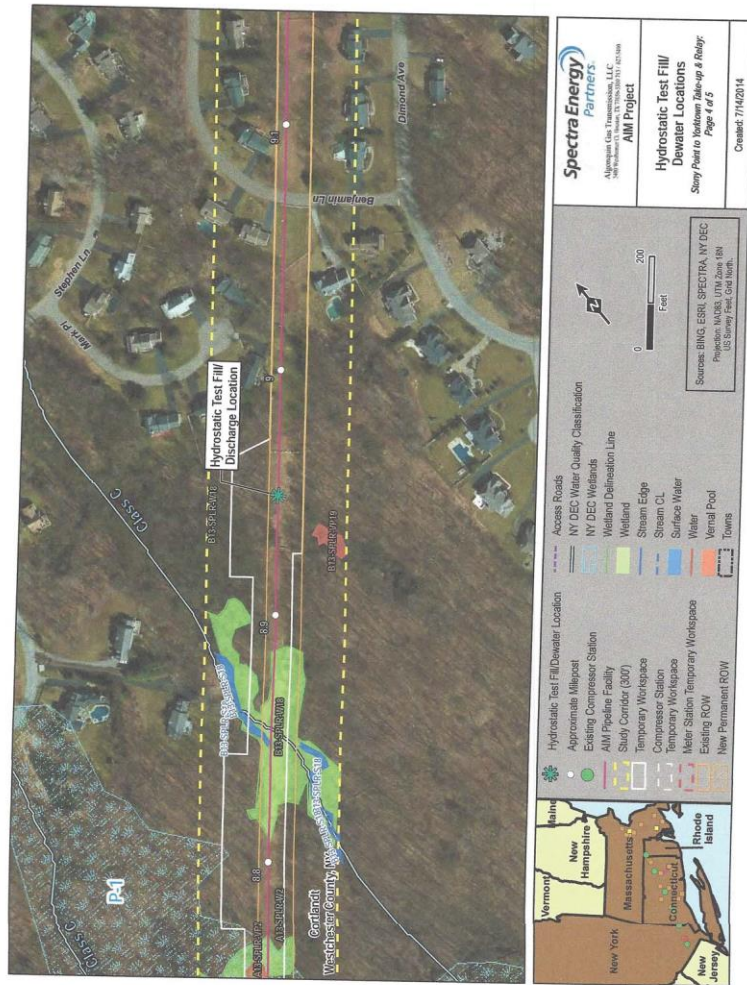
IND232 – Bernard Vaughey (cont'd)



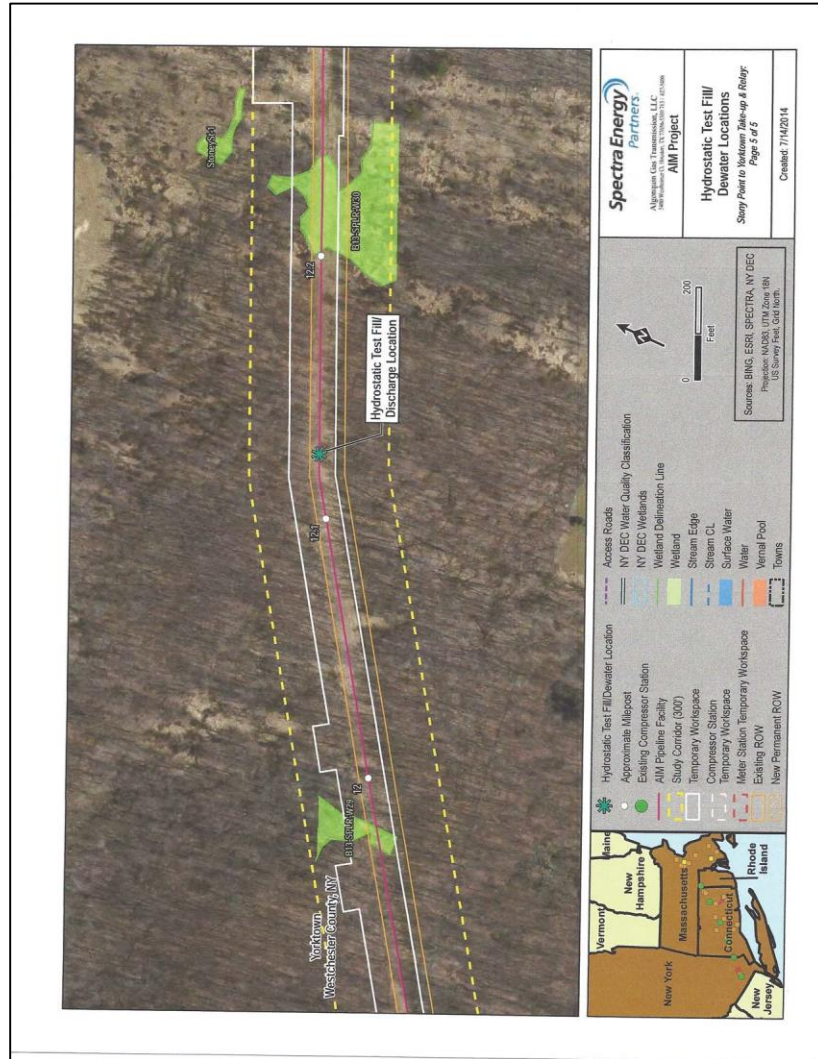
IND232 – Bernard Vaughey (cont'd)



Individuals



IND232 – Bernard Vaughey (cont'd)



IND233 – Theresa Kardos

20140929-5297 FERC PDF (Unofficial) 9/29/2014 4:00:16 PM	
9/29/14 Comments to FERC on AIM Project	
IND233-1	Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the proposed Algonquin Incremental Market (AIM) pipeline expansion project, especially as it affects Westchester and Putnam Counties in N.Y. State. While I understand that that putting together this document has been a lengthy and complicated process, I find it inadequate in several areas, and I urge FERC to withdraw it and take no further action on the application until all the matters included in these comments (and those of others) are addressed in a revised DEIS.
IND233-2	Concerning environmental analysis, FERC staff itself concludes that "the AIM project would result in adverse environmental impacts". FERC staff reports that long-term and potentially permanent environmental impacts on vegetation and individual wildlife species would also occur. The long term impacts would be greatest on forested areas, which is of concern for a number of reasons, including the need for trees to negate the effects of climate change.
IND233-3	Since I live very near the Blue Mountain Reservation, I am particularly concerned with the effects on this natural resource which has been deemed a crucial area for supporting biodiversity in the <i>Croton-to-Highlands Biodiversity Plan</i> . The DEIS neglects to mention, on p. 4-156 where it discusses recreational uses, that trails are also used for horseback riding and that there is a boarding stable immediately adjacent to the Reservation. With that omission, there is no discussion of the effect of construction and concomitant noise and dust on the horses.
IND233-4	There is also confusion about the ultimate size of the right of way (ROW) in the reservation. It is currently mentioned as six feet, though it actually appears larger in certain areas. Would the ultimate ROW be 75 feet along the total path of the pipeline? The pipeline would bisect the reservation, and such a large ROW, if kept completely open, would introduce edge habitats where there were none. The DEIS does not address how high vegetation will be kept along the ROW, and how it will be maintained: by mowing, or by herbicides. The DEIS should address these questions, and how the various methods impact the habitat and biodiversity. Will Algonquin agree to use the method that minimizes the impact as much as possible?
IND233-5	Of Blue Mountain's 1538 acres, 400 acres, or one-quarter, would be lost to the pipeline work area and/or converted to edge habitat. The effect of the pipeline ROW bisecting the Reservation, and fragmenting it in two, on the biodiversity, wetlands, and water quality are not adequately addressed in the DEIS. A question that should be explored is whether the ROW can be limited to 25 feet or less to avoid the above problems.
IND233-6	The DEIS does not address whether the project will disrupt food sources for the various bird species, especially the endangered, threatened and special concern ones, found in and around the work area. Also, how will the timeline of the project affect the nesting, breeding, and foraging of these species?
IND233-7	Concerning eagles, the DEIS does not specify why the radius of 0.5 miles is considered significant for nesting eagles. On what basis what that distance derived?

IND233-1	See the responses to comments FA4-1 and SA1-12.
IND233-2	Comment noted. Sections 4.5 through 4.7 of the EIS discuss the impacts on vegetation, wildlife, and threatened and endangered species, respectively. See also the response to comment FA4-23.
IND233-3	As stated in section 4.8.5.1 of the EIS, no new permanent easement would be required within Blue Mountain Reservation; therefore, there would be no permanent impacts on the reservation or its recreational use for horseback riding. Section 4.8.5.1 of the EIS has been updated to indicate that horseback riding is one of the recreational uses of the reservation. Horseback riders may experience short-term noise and visual impacts during construction within the reservation.
IND233-4	See the response to comment FL8-12.
IND233-5	See the response to comment FL8-12.
IND233-6	See the response to comment FA4-26. Clearing would be prohibited during the migratory bird nesting season (April 15 to August 1) to avoid and minimize impacts on nesting/breeding. Short term impacts may occur to individual foraging/food sources but would not be expected to impact populations of species due to adequate food sources and foraging habitat outside of the construction area.
IND233-7	The 0.5 mile distance is taken from the National Bald Eagle Management Guidelines issued by the FWS in 2007, and is the disturbance buffer for explosives/blasting. To develop these guidelines the FWS relied on existing state and regional bald eagle guidelines, scientific literature on bald eagle disturbance, and recommendations of state and Federal biologists who monitor the impacts of human activity on eagles.

IND233 – Theresa Kardos (cont'd)

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IND233-8 Concerning aquatic species, pipelines near water bodies are risky. Where pipelines run near or beneath water bodies, they are subject to high storm flows and other accidents, and can release gas and hazardous liquids that can enter aquifers and the environment. Vernal pools and wetlands will be affected by this project, thus possibly harming amphibians, already in decline.

IND233-9 As to the drilling under the Hudson River, it is difficult to understand how benthic and epibenthic organisms will not be harmed. Furthermore, the basis for the assumption that resident fish will already be dispersed due to drilling operations is not documented. Similarly, no basis for lack of harm to fish and other biota due to noise from blasting is given.

IND233-10 I am also troubled by FERC's conclusions concerning air pollution. Westchester, Rockland, and Putnam Counties are already non-attainment areas for air quality, especially in ground-level ozone according to the EPA. While baseline air testing for this region is not planned, it is needed. It should be funded by Spectra and performed by an independent expert acceptable to public officials, advocates, and the public, as well as to Spectra Energy. While FERC estimates overall cumulative benefits to the public of the pipeline, it does not address the cumulative effects on air quality: cumulative effects from compressor stations, metering stations and other infrastructure are not considered since each component is evaluated separately. Thus a false view of the impact on air quality is given. It also dramatically underestimates the emission of air pollutants. Since Spectra's metering and regulating station design is not yet complete and documented, the DEIS could not have addressed their pollution levels; however, FERC states that pollutants would not violate National Ambient Air Quality Standards (NAAQS). This assessment is not possible.

The Stony Point and Southeast Compressor stations are projected to emit Volatile Organic Compounds (VOCs), Nitrogen Oxide (NOx), Carbon Dioxide (CO₂), and Carbon Monoxide (CO) in amounts greatly above the EPA threshold for the area. While Spectra is able to bypass this threshold by buying credits in other areas where emissions are under the threshold, we are still breathing this toxic air and will suffer the health consequences, especially children, pregnant women, and those suffering asthma and other respiratory ailments.

Blowdowns of pipelines, both by design and accidental, release hazardous materials that enter the air and are of concern. Mitigation equipment should be installed on emission-releasing equipment, including vapor recovery units, methane capturing equipment, and zero emission dehydrators. No systematic method of informing the public of these dangerous emissions is currently in place. This lack is a public health risk and is unacceptable. A system must be established to alert public officials of planned and accidental blowdowns so that the public can be informed and take protective measures.

IND233-11 Concerning global warming, I find FERC's conclusions on this issue rather cavalier. Methane, which is a much more potent greenhouse gas than CO₂, is known to leak from pipelines and compressor stations and is routinely released by blowdowns. In addition, a huge amount of CO₂ is emitted from compressor stations annually. The DEIS does not address the cumulative effect of these greenhouse gases.

IND233-8 Section 4.6.2.3 of the EIS describes general impacts and measures that would be implemented to minimize impacts on aquatic resources in the Project area. See also the response to comment IND159-24.

IND233-9 As discussed in section 4.7.1 of the EIS with regards to the federally protected Atlantic and shortnose sturgeon, Algonquin selected the HDD method to avoid in water work in the Hudson River, thus minimizing impacts on aquatic organisms in the Hudson River, including benthic organisms. Based on implementation of the HDD method for crossing the Hudson River with the associated Best Drilling Practices Plan and existing turbidity levels in the Hudson, impacts on benthic organisms would not be significant.

IND233-10 See the responses to comments SA1-7, SA4-1, SA4-3, SA4-9, SA4-11, SA11-4, CO12-10, CO16-9, and IND85-57.

IND233-11 See the response to comment FA4-23 for additional information regarding Algonquin's methane emission minimization efforts. See the responses to comments CO12-13 and CO14-55 for additional information regarding GHG impact assessments prepared for the Project.

IND233 – Theresa Kardos (cont'd)

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IND233-12	Similarly, I find the dismissal of concern about radon naïve. Any level of radiation from radon can damage DNA, so no level of short-term or long-term radon exposure is safe. FERC's vague projected timetables about when gas would reach households is not reassuring.
IND233-13	In many instances, FERC requests detailed plans concerning fugitive dust and noise. These should be fleshed out and clarified before any approvals are granted.
IND233-14	I have grave concerns about the siting of the pipeline underneath the Hudson River and onto the Indian Point Energy Center (IPEC). When IPEC was originally built, the two geological fault lines – the Ramapo and the Stamford-Peekskill – were unknown. Today, such a facility would never be approved at this location. Perhaps the chance of an earthquake is slight, but there is a chance. On page 4-263, in Table 4.12.2-1, natural force damage was the #4 cause of natural gas transmission pipeline significant incidents (1994-2013); one might assume that earthquakes fall into this category. Today we have the knowledge, and it does not make sense to place a high-pressure 42 inch gas pipeline 1500 feet from IPEC and 40 years of highly radioactive spent fuel rods. There are also two proposed megawatt electrical projects that would intersect with the pipeline at Indian Point. Supposedly the project managers would confer and construction would proceed on separate schedules, but mistakes happen. What about a lightning strike? Current regulations do not permit gas pipelines in close proximity to nuclear facilities. Why should IPEC and AIM be the exception? In addition, I worry that the convergence of all these energy projects at Indian Point, or even two of them, make this location a magnet for terrorist attacks. An independent consultant should study this issue and such a report should become part of the DEIS.
IND233-15	Having the AIM pipeline pass so close the Buchanan-Verplanck Elementary School is a very bad idea. In addition to the fact that the DEIS says that construction work may need to occur in the beginning or end of the school year, with noise and dust likely to cause disruption to students, the risk of a leak or explosion so close to a school is unacceptable.
IND233-16	By the way, various parts of the DEIS refer to Montrose Station Rd. Since there are two parts to Montrose Station Rd., one between Maple Ave. and Blue Mountain Reservation in Cortlandt Manor and the other between Rte. 9a and Washington St. in Montrose, it is not always clear which part is being referred to. This should be clarified – not only in the text, but to workers as well; many who are not familiar with the area become confused.
IND233-17	While many at the public meeting supported the AIM project in the hope of jobs, the actual projection of local jobs is low. Algonquin estimates that during the peak construction months there would be a peak of 694 local hires – and this is over the <u>entire</u> project. Meanwhile, it is not clear what the financial responsibility of Algonquin would be in case of pipeline-related incidents requiring a public service response, in which tax revenue from Algonquin does not cover the expense. This issue should be clarified. Also, will Algonquin be required to maintain adequate insurance to cover emergency services response expenses in the event of an incident for which they are liable? The coordination and training of local communities, states, and Algonquin managers is vitally important. This coordination should be addressed in the DEIS.
IND233-18	The analysis of projections of energy needs in the Northeast is inadequate. It did not factor in the recent growth of home rooftop solar panel installation and the diminishing costs of solar energy. It did not mention such creative renewable energy uses such as use of water in the

IND233-12 See the response to comment SA4-4.

IND233-13 See the response to comment SA7-5 for additional information regarding fugitive dust. A detailed summary of potential noise impacts and FERC staff recommendations are presented in section 4.11.2 of the EIS.

IND233-14 See the responses to comments FA4-25, SA4-2, SA7-4, and CO7-6.

IND233-15 See the responses to comments SA1-9 and SA4-5.

IND233-16 The affected part of Montrose Station Road is the northeastern part, between Maple Avenue and the Blue Mountain Reservation in Cortlandt Manor. See the maps in appendix B of the EIS (page 3 of 5 of the Stony Point to Yorktown Take-up and Relay segment).

IND233-17 As discussed in section 4.9.1 of the EIS, workforce numbers during construction would range from a low of 10 workers to a peak of 2,693 across all Project components. See also the responses to comments LA1-10, LA1-4, and LA1-9.

IND233-18 See the response to comment CO7-5.

IND233 – Theresa Kardos (cont'd)

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IND233-18
(conf'd) aqueducts in the New York City system to create electricity. It made no reference to studies by Mark Z. Jacobson of Stanford University and Mark A. Delucchi of University of California-Davis about the ability to power N.Y. state (not to mention the world) with alternative energy sources in 20-40 years. The DEIS did not clarify the point that the owners of natural gas companies enjoy special tax breaks which are not granted to renewable energy companies.

IND233-19 While there are supposedly plans in place for monitoring the pipeline frequently, according to the PHMSA, there is difficulty in maintaining a staff of inspectors due to high turnover. Only 7% of all natural gas lines are subject to rigorous inspection criteria or are inspected regularly. As a result, members of the general public are more likely to identify gas leaks than the pipeline companies' own staff or leak detection systems. All in all, I feel that FERC fails to fully account for how individual pipeline projects, taken together, negatively impact public health and the environment. Long pipelines are segmented into individual projects that have cumulative negative impacts. Depending on gas, even as a transition to renewable energy sources, sends a mixed message to our nation about the threat of climate change and the necessity to take urgent action now. Increasing our use of gas will increase greenhouse gases. I believe the focus must be on renewable energy as soon as possible and that with a concerted effort by all segments of the population, this necessity transcends that of an expanded gas pipeline. I urge you to reject approval for the AIM project.

IND233-19

See the response to comment IND138-4. Also, section 4.12.1 of the EIS states that Algonquin would patrol its pipeline right-of-way on a routine basis. PHMSA's regulations require that the patrolling and leakage surveys be performed at least two times a year in Class 3 areas, four times a year in Class 4 areas, and four times a year at highway and railroad crossings. The potential cumulative effects of the proposed facilities along with other existing, planned, or proposed projects are evaluated in section 4.13 of the EIS.

IND234 – Eileen Tresler

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IND234-1 | Eileen Tresler, West Roxbury, MA.
I would like to request that the comment period on this project be extended since many local residents were not aware of the project plans until recently. For this reason, I would also like to request a second FERC hearing/meeting. I am very concerned about the environmental and safety risks of this project. I have an especially serious concern about this pipeline, and a metering station, being built next to an active, blasting quarry in West Roxbury, MA. The potential threat to human and environmental safety makes this project an undesirable one for this area.

IND234-2 |

IND234-1 See the response to comment FA6-5.

IND234-2 See the response to comment FA6-1.

IND235 – Stephen Kohlhasse

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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Algonquin Gas Transmission, LLC,)	CP14-96-000
Algonquin Incremental Market)	PF13-16-000
Project)	

**SUPPLEMENT TO THE MOTION TO INTERVENE AND COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT OF STEPHEN KOHLHASE**

IND235-1

Pursuant to 18 C.F.R. sections 380.10 and 385.214,¹ Stephen Kohlhasse hereby supplements his Motion to Intervene and comments on the Draft Environmental Impact Statement (DEIS)² for the certification of Algonquin Gas Transmission, LLC's proposed Algonquin Incremental Market (AIM) Project.

Algonquin Gas Transmission, LLC (Algonquin) is seeking to expand its existing pipeline in New York, Connecticut, Rhode Island, and Massachusetts.³ Mr. Kohlhasse has significant concerns that the infrasonic and low-frequency vibration and noise impacts from the existing pipeline located within Connecticut were not adequately addressed in Iroquois Gas Transmission System L.P.'s (Iroquois) 08/09 Expansion Project⁴ and that the proposed expansion may worsen the impacts. He requests additional study into the vibration and noise issues associated with the AIM Project prior to issuance of the Final Environmental Impact Statement (FEIS), as outlined below.

I.
SUPPLEMENT TO MOTION TO INTERVENE

On September 24, 2014, Mr. Kohlhasse filed a Motion to Intervene in this proceeding.⁵ He provides additional information regarding his interests in this proceeding and requests to be added to the service list maintained by the Secretary.

¹ Under 18 C.F.R. § 380.10(a)(1), a motion to intervene on the basis of a draft environmental impact statement is timely if filed within the comment period, which has been set to September 29, 2014, for the AIM Project.

² eLibrary no. 20140806-4001.

³ DEIS, p. M-2.

⁴ See Iroquois, "08/09 Expansion Project Resource Report 9," eLibrary no. 20070928-4018 (Sept. 2007).

⁵ eLibrary no. 20140924-5005.

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See the response to comment LA34-1.

IND235 – Stephen Kohlhasse (cont’d)

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Mr. Kohlhasse resides in Brookfield, Connecticut. His property – a noise-sensitive area – is located less than one quarter of a mile from the Brookfield Compressor Station and less than 150 feet from two of Algonquin’s lesser-pressure lines which converge at the Brookfield Compressor Station and compress gas for transmission to Iroquois’ higher-pressure line. In addition, his place of employment near Oxford, Connecticut is within one mile of a portion of the 1,120-mile Algonquin Gas transmission pipeline.⁶ The AIM project proposes to make changes to additional facilities located a short distance from his home and place of work. The Southeast Compressor Station proposed for upgrade is located approximately 10 miles west of Brookfield Compressor Station. The replacement of 4.4 miles of pipeline directly east of the Southeast Compressor Station terminates approximately 3 miles west of the Brookfield Compressor Station. The Oxford Compressor Station proposed for upgrade is located approximately 12 miles east of the Brookfield Compressor Station.

Since the Brookfield Compressor Station and other upgrades to both the Iroquois and Algonquin systems became fully operational in 2009, Mr. Kohlhasse has suffered adverse effects from the low-frequency vibration and sound emanating from, in some combination, the Brookfield Compressor Station and three of the pipelines that pass through the area.⁷ He has heard reports from others that they have suffered similar effects. The stress of the chronic exposure to the vibration and sound caused by the Brookfield Compressor Station and connected pipelines have affected his and his family’s health and interferes with the use and enjoyment of his property. Further, he is concerned about the general effects of the cyclic operating conditions, suspected to be the root cause of the pipeline’s radiated sound waves, on mental health, the local ecology, and the mechanical integrity of the pipelines.⁸

Mr. Kohlhasse and others have reported experiencing two types of disturbances caused by natural gas transmission systems: flutter and hum.

Flutter is an airborne pressure wave caused by vortex shedding instabilities from the turbine exhausts of compressor stations. Flutter is affected by various factors including compressor operations, atmospheric conditions, and distance from receptor locations. These airborne pressure waves trespass beyond Iroquois’ property into neighboring yards and homes, resulting in sensible pulsations of the air and vibration inside and outside of homes. These pressure waves impact homes located in proximity of the Brookfield Compressor Station – the closer to the Station, the worse the flutter.⁹

⁶ The vibration issue is often more intense at this location than at Mr. Kohlhasse’s home.

⁷ See letter from Stephen Kohlhasse to Kimberly D. Bose, FERC, eLibrary no. 20140707-5016 (July 3, 2014), p. 2.

⁸ *Id.*

⁹ See Complaint re Iroquois Gas Transmission System and Algonquin-Spectra Transmission Company, eLibrary no. 20121009-5127 (Oct. 5, 2012) (2012 Complaint), p. 4. One particular home at 67 High Meadow Lane, located within 500 feet of the Station, experienced such severe flutter that the owner sold the home at far below market value to unload the residence.

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IND235 – Stephen Kohlhasse (cont'd)

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IND235-I
(cont'd)

Hum is a far more complex, widespread, and onerous problem. It is less perceptible to the population being affected. It is not a typical vibration generating sound mechanism. It is a wide band of infrasonic and low-frequency sound waves generated by the internal conditions of a pipeline. Hum is guided long distances through pipeline systems, radiating away from them for miles and attenuating only after great distances. These sound waves are not generally perceptible outside. They require an interaction with a hollow structure to induce a resonance vibration with the structure and result in debilitating hum inside buildings and other enclosures. Hum adversely affects people's mental and physical wellbeing.¹⁰

In October 2010, shortly after the pipeline failure in San Bruno, Mr. Kohlhasse's findings were concerning enough that Iroquois and Algonquin dug test pits on each of the three transmission lines and performed non-destructive stress testing. They concluded that the structural integrity of the pipelines was within safe limits.¹¹ However, they did not perform any acoustic profiling, as requested by Mr. Kohlhasse.

On December 10, 2010, the Director of OEP responded to a November 24, 2010 letter from Mr. Kohlhasse, informing him of steps that OEP was taking to address his concerns.¹² Such steps included:

- Requiring Iroquois to install additional insulation at the Brookfield Compressor Station and Algonquin metering station to meet the Commission's noise regulations of a day-night noise level of 55 dBA-weighted scale for a problem caused by intercompany gas transfer systems called hiss; and
- Requiring Iroquois and Algonquin to "provide information to assist [OEP] in determining whether the pipelines and/or compressor station could be the source of vibration and low frequency noise that you and other residents have contacted us about."¹³

The OEP Director confirmed that

the Commission is committed to ensuring that natural gas pipeline facilities under its jurisdiction comply with our requirements regarding noise and vibration, and to

¹⁰ *Id.* Since 2009, Mr. Kohlhasse has worked to encourage the development of field data regarding the issue before FERC. *Id.* The existing data show that the source of the sound waves that ultimately transform into hum occur along the right of ways of Iroquois and Algonquin's natural gas transmission systems. *Id.*

¹¹ South West Research Institute and Kiefner & Associates provided the companies' specific-purpose reports.

¹² Letter from Jeffrey Wright, FERC, to Stephen Kohlhasse, eLibrary no. 20101210-4001 (Dec. 10, 2010), p. 1; *see also* letter from Jon Wellinghoff, FERC Chairman, to Hon. Christopher S. Murphy, eLibrary no. 20110210-0019 (Jan. 31, 2011).

¹³ December 10, 2010 Letter, p. 1.

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IND235 – Stephen Kohlhasse (cont’d)

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(cont'd)

addressing the concerns of nearby residents. My staff will continue to investigate this matter and keep you informed about our findings.¹⁴

The noise and vibration studies submitted by Iroquois, as directed by OEP, concluded that “noise attributable to the operation of all of the equipment at that site is in compliance with the Commission’s regulations.”¹⁵

In November 2011, OEP sent four engineers to the neighborhood and homes near the Brookfield Compressor Station. They visited 67 High Meadow and Mr. Kohlhasse’s home to investigate concerns regarding vibration and noise caused by the transmission systems. The four engineers confirmed vibration at the homes.¹⁶ OEP Staff directed Iroquois to provide additional information on what specific measures it would implement to eliminate the vibration at Mr. Kohlhasse’s home and other homes in the area.¹⁷

On July 26, 2012, Iroquois submitted a report on the status of post-construction noise issues pertaining to the Brookfield Compressor Station.¹⁸ In transmitting the report, Iroquois stated that it was in “full compliance with all applicable noise standards” and that it would not be undertaking any further study to resolve the “continuing concerns of a few landowners.”¹⁹ It did not address the problem of continuing flutter and hum.

On October 12, 2012, Mr. Kohlhasse filed a complaint with the Commission about the adverse effects of vibration and noise.²⁰ He reiterated his long-standing request that the Commission investigate the specific causes of the vibration and noise emanating from the Iroquois and Algonquin systems and require both companies to implement measures to eliminate or mitigate the noise and vibration.²¹ The Commission has not taken formal action on his complaint.

¹⁴ *Id.* at 1-2.

¹⁵ Letter from Jeffrey A. Bruner, Iroquois, to Kimberly D. Bose, FERC, eLibrary no. 20110106-5152 (Jan. 6, 2011), p. 1.

¹⁶ E-mail from Eric Tomasi, FERC, to Stephen Kohlhasse (Dec. 2, 2011) (Attachment 1).

¹⁷ *Id.*

¹⁸ Letter from Jeffrey A. Bruner, Iroquois, to Kimberly D. Bose, FERC, eLibrary no. 2120726-5039 (July 26, 2012).

¹⁹ *Id.* at 1-2.

²⁰ See 2012 Complaint.

²¹ *Id.* at 1.

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IND235 – Stephen Kohlhasse (cont'd)

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On September 10, 2014, Mr. Kohlhasse provided oral comments at the public hearing for the AIM project convened by the Commission in Danbury, Connecticut. He restated the ongoing problems with low-frequency vibration and noise at his and neighboring properties caused by the Iroquois and Algonquin transmission systems.²² He stated opposition to the Commission certifying the AIM project unless and until the ongoing noise and vibration problems were addressed.²³

As discussed above and shown in his numerous filings, Mr. Kohlhasse has a significant interest in this proceeding, as it may worsen the impacts of vibration and noise caused by Iroquois and Algonquin transmission systems and further interfere with the use and enjoyment of his property and his and his family's health. No existing parties can adequately represent his interests. He has been one of the few individuals to consistently pursue these issues before the Commission since the onset of the problem in 2009.

He requests that he and his representatives be added to the service list for this proceeding, as follows:

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²² See Stephen Kohlhasse, "Response to AIM draft EIS- Low Frequency Flutter and Hum," eLibrary no. 2014091405049 (Sept. 2, 2014), p. 1.

²³ See *id.* at 2.

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IND235 – Stephen Kohlhasse (cont’d)

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IND235-2

II.

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

The Commission has enacted regulations that limit the vibration and noise that a compressor station may permissibly cause. The DEIS does not adequately address the ongoing problems and the potential increase in low-frequency vibration and noise at the Brookfield Compressor Station and from the Iroquois and Algonquin pipelines in close proximity to Mr. Kohlhasse's property that may result from the proposed expansion of the transmission system under the AIM Project. In fact, the DEIS largely excludes any discussion of vibration whatsoever, despite its regulatory obligation to address such impacts.

In granting a certificate of public convenience and necessity, the Commission must find that "the applicant is willing and able to . . . conform to the provisions of this chapter and the requirements, rules, and regulations of the Commission" ²⁴ Further, the Commission can require "such reasonable terms and conditions as the public convenience and necessity may require." ²⁵

Under 18 C.F.R. § 380.12(k)(4)(A), Algonquin must ensure that the noise attributable to a new compressor station, compression added to an existing station, or any modification, upgrade or update of an existing station, does not exceed a day-night average noise level of 55 decibels at any pre-existing noise-sensitive areas (such as schools, hospitals or residences). It must be able to document compliance with this standard.

Under 18 C.F.R. § 380.12(k)(4)(B), Algonquin must ensure that there is no increase in perceptible vibration from the operation of the compressor station. ²⁶ As with noise, Algonquin must be able to document compliance with this standard, including the impacts of the modifications on the entire system. ²⁷

In Iroquois' 08/09 Expansion Project, Resource Report 9 did not discuss vibration, as required by the regulations, ²⁸ and the certification issued by FERC did not include mitigation measures for vibration. ²⁹ Because of the perceptible vibrations near the Brookfield Compressor

²⁴ 15 U.S.C. § 717f(e).

²⁵ *Id.*

²⁶ See *Transcon. Gas*, 126 FERC ¶ 61,189 (2009) ("[t]he Commission's regulations also require that the facility modifications must not result in any perceptible increase in vibration at those residences."); see also *Tenn. Gas*, 136 FERC ¶ 61,125 (2011) ("Commission's regulations require that new compressor stations not result in a perceptible increase in vibration at any NSAs [noise-sensitive areas].").

²⁷ *Transcon. Gas*, 144 FERC ¶ 61,042 (2013).

²⁸ eLibrary no. 20070928-4018 (Sept. 2007).

²⁹ *Iroquois Gas*, 122 FERC ¶ 61,242 (2008).

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See the response to comment LA34-1.

IND235 – Stephen Kohlhasse (cont'd)

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(cont'd)

Station resulting from the 08/09 Expansion Project, FERC ended up requiring post-certification studies for vibration and noise. However, after additional study and mitigation, Iroquois determined that it had done its best to comply,³⁰ and no further study or mitigation was required, despite the continuing perceptible vibration at Mr. Kohlhasse's residence, in direct violation of the regulations.

The current proceeding is on a similar trajectory. The only vibration that Resource Report 9 evaluates is turbine exhaust noise at compressor stations,³¹ which the Report summarily concludes "will be adequately mitigated."³² The Report does not address other types of vibration, including flutter and hum, or the potential increase in vibration at existing compressor stations. In its application, Algonquin only addresses mitigation of vibration resulting from construction, leaving completely unaddressed vibration resulting from project operation.³³

The DEIS limits its analysis of vibration and noise, finding that only "residential structures within 50 feet of the construction work areas would experience effects of Project construction and operation."³⁴ This obviously excludes major sections of pipeline where operations will be altered by the AIM Project. Section 4.11.2 of the DEIS discusses noise but notably excludes any discussion of vibration.³⁵ Further, OEP's findings in Section 5 do not address vibration at all.³⁶

The DEIS does not discuss the cumulative vibration and noise effects of the proposed and existing natural gas transmission facilities in violation of 40 C.F.R. § 1502.16.³⁷

³⁰ Letter from Jeffrey A. Bruner, Iroquois, to Kimberly D. Bose, FERC, eLibrary no. 2120726-5039 (July 26, 2012).

³¹ The report evaluates Stony Point, Southeast, Cromwell, Chaplin, and Burrillville Compressor Stations, excluding Oxford, presumably because of the limited scope of work at that location.

³² Algonquin, "AIM Project Resource Report 9," eLibrary no. 20131105-5010 (Nov. 2013), pp. 9-44 – 9-49. Resource Report 3only discusses the effects of blasting vibration on fish and wildlife and does not address flutter and hum. eLibrary no. 20131104-5161 (Nov. 2013), p. 3-13. Resource Report 8 does not describe the public health and safety effects of flutter and hum as required by 18 C.F.R. § 380.12(j)(8). eLibrary no. 20131104-5161 (Nov. 2013).

³³ Algonquin, "Application for Certificate of Public Convenience," eLibrary no. 20140228-5269 (Feb. 2014), Exhibit Z-4, pp. 22-23.

³⁴ DEIS, pp. 4-140, 4-251 – 4-254.

³⁵ *Id.* at 4-237 – 4-255.

³⁶ *Id.* at 5-13 – 5-14.

³⁷ See also 18 C.F.R. § 380.12(b)(3) (requiring resource reports to analyze "cumulative effects resulting from existing or reasonably foreseeable projects"). The resource reports make no mention of the existing flutter and hum issue.

Stephen Kohlhasse
MOI and DEIS Comments
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IND235 – Stephen Kohlhasse (cont'd)

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IND235-2
(cont'd)

The fact remains, however, that there is perceptible vibration at Stephen Kohlhasse's property in clear violation of the regulations. The AIM Project will likely further contribute to the vibration. Algonquin and the Commission must ensure that the AIM Project will address the existing problem and not exacerbate it.

We request that FERC update the DEIS to comply with the regulations as noted above. We request that FERC require study of flutter and hum in advance of issuing certification. Specifically, we request acoustic profiling throughout the pipeline system to determine the existing extent of flutter and hum, in addition to the expected effects of the AIM Project on flutter and hum.

Thank you for considering these comments.

Dated: September 29, 2014

Respectfully submitted,



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*Stephen Kohlhasse
MOI and DEIS Comments
Algonquin Gas, AIM Project (CP14-96-000)*

IND235 – Stephen Kohlhasse (cont'd)

20140929-5320 FERC PDF (Unofficial) 9/29/2014 4:25:08 PM

DECLARATION OF SERVICE

Algonquin Gas Transmission, LLC, Algonquin Incremental Market Project (CP14-96-000, PF13-16-000)

I, Nicholas Niiro, declare that I today served the attached "Supplement to the Motion to Intervene and Comments on the Draft Environmental Impact Statement of Stephen Kohlhasse" by electronic mail, or by first-class mail if no e-mail address is provided, to each person on the official service list compiled by the Secretary in this proceeding.

Dated: September 29, 2014



Nicholas Niiro
WATER AND POWER LAW GROUP PC
2140 Shattuck Ave., Suite 801
Berkeley, CA 94704-1229
Phone: (510) 296-5591
Fax: (866) 407-8073
nniirro@waterpowerlaw.com

Stephen Kohlhasse
MOI and DEIS Comments
Algonquin Gas, AIM Project (CP14-96-000)

IND235 – Stephen Kohlhasse (cont'd)

20140929-5320 FERC PDF (Unofficial) 9/29/2014 4:25:08 PM

Attachment 1

IND235 – Stephen Kohlhasse (cont'd)

Re: Update on Iroquois Discussion

Page 1 of 1

IND235-3

From: paramita metta <junil09@gmail.com>
To: Steve Kohlhasse <skohlhasse@aol.com>
Subject: Re: Update on Iroquois Discussion
Date: Thu, Aug 2, 2012 8:43 pm

8

Per your request:
On Fri, Dec 2, 2011 at 5:24 PM, Eric Tomasi <Eric.Tomasi@ferc.gov> wrote:

Hello Jun,

I had a conference call with Iroquois today. We informed the company that the four engineers who visited you noticed readily apparent vibration at your home. We informed the company that we are requesting that they tell us what specific measures they will do to eliminate vibration at your home and other homes in the area.

In addition, I requested that they specifically look into the feasibility of planting shrubs and/or fast growing trees along High Meadow Lane to add additional visual screening between the road and the station.

Also, I asked them to demonstrate that they implemented all the screening methods that they committed to install during the initial project.

We also discussed safety issues, including evacuation routes for both homes at the end of High Meadow Lane during any incidents.

If you wish to call me on Monday, I will be in the office all day.

Sincerely,

Eric Tomasi
Environmental Engineer
Federal Energy Regulatory Commission
Office: (202) 502-6097
Mobile: (202) 297-1391

<https://mail.aol.com/37001.111/aol.6/aen.net/mail/PrintMessage.aspx> 8/2/2012

IND235-3

See the response to comment LA34-1.

IND-433

Individuals

IND235 – Stephen Kohlhasse (cont'd)

Iroquois update

Page 1 of 1

From: Eric Tomasi <Eric.Tomasi@ferc.gov>
To: Steve Kohlhasse <skohlhasse@aol.com>; Riccobru <Riccobru@aol.com>
Subject: Iroquois update
Date: Fri, Dec 2, 2011 5:32 pm

IND235-4

Hello Steve, Bruno,

I had a conference call with Iroquois today. We informed the company that the four engineers who visited you noticed readily apparent vibration at your home. We informed the company that we are requesting that they tell us what specific measures they will do to eliminate vibration at your home and Jun 11's home.

In addition, I requested that they specifically look into the feasibility of planting shrubs and/or fast growing trees along High Meadow Lane to add additional visual screening between the road and the station.

Also, I asked them to demonstrate that they implemented all the screening methods that they committed to install during the initial project.

We also discussed safety issues, including evacuation routes for both homes at the end of High Meadow Lane during any incidents.

If you wish to call me on Monday, I will be in the office all day.

Sincerely,

Eric Tomasi
Environmental Engineer
Federal Energy Regulatory Commission
Office: (202) 502-8097
Mobile: (202) 297-1391

<mailto:skohlhasse@aol.com>

0/00/0012

IND235-4 See the response to comment LA34-1.

IND236 – Ray Porfilio

20140929-5323 FERC PDF (Unofficial) 9/29/2014 4:31:34 PM	
<p>ray porfilio, west roxbury, MA. September 23, 2014</p> <p>Re: AIM Project Docket # CP14-96</p>	
IND236-1	As a 25-year resident of West Roxbury, I am writing in opposition to the AIM project as currently described in the Draft Environmental Impact Statement for the following reasons:
IND236-2	<p>1. The AIM project is one among a number of gas pipeline infrastructure currently being proposed or planned for Massachusetts and the AIM project should be considered in conjunction with those. Further, the pipeline projects taken together represent a significant area of public debate, worthy of the broadest hearing possible.</p> <p>2. According to news reports, Spectra and its affiliates are proposing additional infrastructure projects in Massachusetts. These should be considered in their totality and should be segmented, literally or figuratively.</p>
IND236-3	3. My understanding is that the State is undertaking a report on gas infrastructure due before the end of 2014. It seems premature to be advancing approvals on projects without the benefit of such a report.
IND236-4	4. There is a justification for the project that assumes benefits for consumers but I did not see any indication, let alone a guarantee, that savings would be passed along to consumers.
IND236-5	5. For the West Roxbury Lateral, I did not see alternatives provided for the location of the M&R station across from an active quarry. Further I did not see discussion of the number of other M&R stations located adjacent to active quarries and their safety records.
IND236-6	6. The West Roxbury Lateral delivering high-pressure gas to the M&R station across from the quarry is proposed to run through heavily settled residential areas in Dedham and West Roxbury which inherently raises questions of safety.
IND236-7	<p>For these reasons I am opposed to the AIM project and would argue that at a minimum FERC should postpone any decision until such items can be adequately and publicly addressed.</p> <p>Respectfully yours, Ray Porfilio</p> <p>32 Pomfret Street West Roxbury, MA 02132</p>

IND236-1 Comment noted.

IND236-2 Cumulative impacts are evaluated in section 4.13 of the EIS. The analysis identifies and describes cumulative impacts that would potentially result from implementation of the AIM Project. Projects by Algonquin or other natural gas transmission companies are discussed; however, many have been determined to be outside of the same region of influence as the AIM Project and would not result in cumulative impacts. See also the responses to comments FA3-5 and FA4-24.

IND236-3 Section 1.1 of the EIS discusses the purpose and need for the Project. We are responsible for reviewing all projects that submit applications. See the response to comment SA2-2.

IND236-4 The gas shipped on the AIM Project facilities would be serving demands from local utilities, among other entities, whose role it is to assess natural gas needs in their respective service areas. Whether the gas transportation contracts result in cost savings for individual shippers, and how any such savings are allocated or passed on to consumers, is more appropriately addressed through the state public utilities commission or applicable agency with jurisdiction over the local distribution agency. Economic benefits of the Project, including tax revenues generated from operation of the Project are discussed in section 4.9.9 of the EIS.

IND236-5 We evaluated one alternative to the proposed West Roxbury M&R Station (see section 3.6.2.3 of the EIS) but did not identify any other viable alternative M&R sites. We determined that this alternative site was not environmentally preferable to the proposed site. We evaluated safety concerns associated with the proximity of the proposed M&R station to the quarry (see section 4.1.4 of the EIS) and did not identify any significant safety concerns associated with the construction or operation of the M&R station near the quarry at this location. See also the response to comment FA6-1.

IND236-6 See the response to comment FA6-1.

IND236-7 Comment noted. See also the response to comment FA4-1.

IND237 – Kristy

20140929-5325 FERC PDF (Unofficial) 9/29/2014 4:32:11 PM

IND237-1 | Kristy, Woodstock, NY.
DO NOT ALLOW THIS PIPELINE OR ANY FRACKING AT ALL.
AVOID DISASTERS, SAY NO TO ATM!!!

IND237-1

Comment noted.

IND238 – Karen Sauer

20140929-5327 FERC PDF (Unofficial) 9/29/2014 4:44:23 PM

IND238-1 | Karen Sauer, West Roxbury, MA.
Re: Docket No. CP14-96-000
I strongly oppose the Algonquin Incremental Market Project.

IND238-2 | In these (climate) changing times, I do NOT feel that we should take for granted our "right" to heat and cool our homes with fossil fuels. Much more could be done to conserve energy. Much more exploration of renewable resources (such as solar and wind power) should be done, in my opinion.

IND238-3 | Building the transfer station near the active quarry seems to me to be the height of irresponsibility, if not downright criminal stupidity. The big San Bruno, California explosion was four years ago <http://sanfrancisco.cbslocal.com/tag/san-bruno-explosion/> and they are almost (!!!) finished with rebuilding???

IND238-4 | If the THOUSANDS of gasleaks in Boston were fixed, could this help the "shortage?" It would certainly make life more pleasant for those who have to smell gas on their corners and might even give people a little faith in the suppliers.

Sincerely,
Karen Sauer

IND238-1

Comment noted.

IND238-2

Comment noted. See the response to comment FL2-2.

IND238-3

See the response to comment FA6-1.

IND238-4

See the response to comment IND53-2.

IND239 – Jon Fein

20140929-5329 FERC PDF (Unofficial) 9/29/2014 4:53:01 PM

IND239-1 | Jon Fein, Cortlandt Manor, NY.
I noticed that, at approximately 4:30pm today, 9/29, on the last day for comments, Spectra submitted supplemental information about their plans for the ALM project. It seems that they intend to take even more forest/woodland of the Blue Mountain Reservation than indicated in the DEIS. The public must have an opportunity to digest this document and comment on it. The review process must be extended to allow for this to happen.

IND239-1

The EIS has been revised to reflect the additional information provided in Algonquin's September 29, 2014 supplemental filing. See also the responses to comments FA4-1 and FA6-5.

IND240 – Lisa Petrie

20140930-5000 FERC PDF (Unofficial) 9/29/2014 5:03:13 PM

IND240-1 | Lisa Petrie, Carolina, RI.
I am concerned that the EIS does not fully reflect the impacts of the project on air and water quality in Burrillville, as well as the risk of fire and explosion at the compressor station there and along the length of the pipeline due to the impact of transporting an increased volume of gas at increased pressure through an aging pipeline.
IND240-2 |
What studies were used to assess these impacts? Please provide citations and explain why those studies were chosen.
Thank you.

IND240-1

See the response to comment SA4-9.

IND240-2

Section 4.12.1 of the EIS discusses federal safety standards for natural gas pipelines and how these standards are applied in HCAs. Section 4.12.3 of the EIS discusses safety-related concerns and other specific measures that Algonquin has proposed or that we are recommending to further address public safety concerns.

IND241 – Grace and John Ostermann

20140929-0023 FERC PDF (Unofficial) 09/29/2014

FEDERAL ENERGY REGULATORY COMMISSION

ALGONQUIN INCREMENTAL MARKET PROJECT (DOCKET NO. CP14-96-000)

Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below or (3) electronically filed¹.

Please send one copy referenced to Docket No. CP14-96-000 to the address below.

For Official Filing:
Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

ORIGINAL

FILED
SECRETARY OF THE
COMMISSION
SEP 29 A 11:28
FEDERAL ENERGY
REGULATORY COMMISSION

COMMENTS: (PLEASE PRINT) *(continue on back of page if necessary)*

IND241-1 After attending the public comment meeting on September 15, 2014, it
has become apparent to me that this entire project needs much more
consideration.
I submit the attached news item that was released by the
Government Accountability Office today (9/22/14). It seems that the issue
is cause for concern in more than the Hudson Valley.
All comments about the problems with the proposed pipeline project
have great validity and need to be adequately addressed by FERC
and Spectra.

Commentor's Name and Mailing Address *(Please Print)*
Grace + John Ostermann
418 Colonel Greene Road
Yorktown Heights, NY 10598

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Sign up" or "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." All comments submitted under eFiling are placed in the public record for the specified docket or project number(s).

IND241-1

See the response to comment FA4-1.

IND241 – Grace and John Ostermann (cont'd)

20140929-0023 FERC PDF (Unofficial) 09/29/2014

[Redacted content]

IND241 – Grace and John Ostermann (cont'd)

20140929-0023 PERC PDF (Unofficial) 09/29/2014
 More Fiery Oil Train, Pipeline Accidents Unless Government Acts: Report - NBC News.com

9/22/14, 12:56 PM

BREAKING: BILL AND HILLARY CLINTON SPEAK LIVE FROM NEW YORK CITY GET ALERTS

HOME NEWS POLITICAL NEWS LOCAL NEWS WORLD NEWS BUSINESS NEWS HEALTH NEWS SCIENCE NEWS

NEWS / INVESTIGATIONS

3 hours

More Fiery Oil Train, Pipeline Accidents Unless Government Acts: Report

IND241-2

If the U.S. doesn't quickly address the safe transportation of oil and gas, Americans could pay the price with more fiery train and pipeline accidents, according to a report released today by the Government Accountability Office.

"Without timely action to address safety risks posed by increased transport of oil and gas by pipeline and rail, additional accidents that could have been prevented or mitigated may endanger the public and call into question the readiness of transportation networks in the new oil and gas environment," found the report.

The GAO report focused on the safety of moving crude oil by train and the growing network of "gathering lines," largely unregulated natural gas pipelines. Both have been subjects of recent investigations by NBC News. The GAO determined that the Department of Transportation had "not kept pace with the changing oil and gas transportation environment."

Oil and gas production in the U.S. increased more than fivefold between 2007 and 2012, a boom brought on by technological advances in drilling and hydraulic fracturing, or "fracking." Vast volumes of oil and gas production soon outstripped the pipeline infrastructure in place to move them.

Crude producers began to load their oil on trains. More than 400,000 carloads of crude ran over North American rails in 2013, up from just 9,500 in 2008. But a series of explosive wrecks have raised concern about the safety of oil trains — the worst, a 2013 derailment outside a small Quebec town, killed nearly 50 people.

A 2013 NBC News investigation found regulators had long known that the tank cars used to ship oil were vulnerable to rupture in an accident.

The DOT has since issued proposed rules to improve the train cars that carry oil. In its report, the GAO applauded the move, but emphasized safety improvements must go beyond the cars.

<http://www.nbcnews.com/news/investigations/more-fiery-oil-train-pipeline-accidents-unless-government-acts-report-n208441>

Page 1 of 10

IND241-2

The referenced news article about a Government Accounting Office report focuses on safety considerations of rail transport, and on oil and natural gas gathering lines. The AIM Project is neither; it is a natural gas transmission line, which is in fact subject to stringent safety regulations and oversight by PHMSA, as discussed in section 4.12.1 of the EIS.

IND241 – Grace and John Ostermann (cont'd)

20140929-0023_FERC PDF (Unofficial) 09/29/2014
More Flery Oil Train, Pipeline Accidents Unless Government Acts: Report - NBC News.com

9/22/14, 12:56 PM

IND241-2
(cont'd)

including testing the makeup of the oil, which the DOT has said is particularly flammable.

The GAO also warned better oversight was needed over the growing network of "gathering pipelines" that move natural gas from the well. In August, an investigation by NBC News found that 250,000 miles of these lines are in rural areas and subject to little or no federal or state safety oversight, despite sometimes running beside homes.

Go pipeline explodes 50 miles south of Dallas

Alexandria Entrepreneurs tied to financing?

RELATED

- Danger on the Tracks: Unsafe Rail Cars Come Out Through U.S. Exports
- Danger Breeds Fear as Go Pipeline Threatens Rural Residents

<http://www.nbcnews.com/news/investigations/more-flery-oil-train-pipeline-accidents-unless-government-acts-report-n208441>

Page 2 of 10

IND242 – Nicolas Katkevich

20140930-5002 FERC PDF (Unofficial) 9/29/2014 5:33:25 PM	
IND242-1	<p>Nicolas Katkevich, Providence, RI. I urge you to withdraw the draft EIS statement for the AIM pipeline expansion project on several grounds:</p> <p>Firstly, it is clear that this EIS is not finished as there are several sections lacking complete information. For the public to have ample opportunity to fully weigh in on the impacts of this project, all portions of the EIS must be complete.</p>
IND242-2	<p>Additionally, Spectra Energy fails to adequately address noise issues related to the expanded compressor stations in section 4.11.2.2. In this section Spectra energy admits that the noise coming from the expanded compressor station in Burrillville will most likely exceed limits.</p> <p>Spectra claims that it will take up to six months to determine if in fact the compressor does exceed limits, and up to a year to figure out how control the noise. It is inexcusable to put local residents through unnecessary noise as Spectra figures out how to control it. Spectra must make adjustments in their expansion plans so that projected noise levels from the Burrillville compressor station are below 55 d5A. This information should be submitted in a revised EIS.</p>
IND242-3	<p>Spectra has recently announced two additional expansions to their New England pipeline networks, including the "Algonquin" Pipeline. These expansions would be equal or greater than the AIM project. While the details of these additional expansions are minimal but some valuable information has been shared.</p> <p>One thing to note is that some of the same compressor stations expanded during the AIM project are set to be expanded again during the "Atlantic Bridge Project". There are also new pipeline expansions proposed near areas affected by the AIM project.</p> <p>It does not make sense to judge the environmental impact of the AIM project without taking into account the additional expansions that are planned. All three pipeline expansion projects must be considered as one project and their environmental impact considered collectively.</p> <p>There is also legitimate concern that the gas traveling through these pipelines is not only for domestic use, but also for overseas export. Industry documents explicitly state that the first step in bringing gas to the Maritimes in Canada where LNG export terminals are being built is the AIM project. If Spectra completes the AIM project next up is the "Atlantic Bridge" proposal that will not only expand the Algonquin pipeline yet again, but also reverse the flow of it's pipeline in Maine to bring gas to Canada.</p> <p>Industry documents state the vision for exports and Spectra's plans serve as confirmation. With this understanding, the EIS must be revoked and the whole AIM project reevaluated.</p> <p>As a member of FANG: Fighting Against Natural Gas and a resident of Rhode Island, I urge you to withdraw this EIS.</p>

IND242-1 See the response to comment FA4-1.

IND242-2 Section 4.11.2.2 of the EIS provides existing noise levels attributable to the Burrillville Compressor Station and estimates future noise levels following station modifications. The existing noise levels at the Burrillville Compressor Station exceed FERC's noise criterion. FERC Staff has provided recommendations to ensure that future noise levels comply with FERC noise standards where noise levels are currently below the FERC criterion or do not exceed existing noise levels where the current noise levels are above the FERC criterion.

IND242-3 See the responses to comments FA3-5, LA23-16, and CO15-4.

IND243 – Susan Holland

20140930-5003 FERC PDF (Unofficial) 9/29/2014 7:08:55 PM

IND243-1 Susan L Holland, Ulster Park, NY.
The proposed Algonquin Incremental Market (AIM) pipeline project should be rejected and denied.

IND243-2 The proposed location for the pipeline presents a likely scenario for a potential catastrophic disaster. Situated under the majestic Hudson River, near the spent fuel rods of the Indian Point nuclear power plant and major electrical transmission lines, an explosion would be detrimental to all forms of life.

IND243-3 The pipeline would enable and encourage more horizontal high-volume hydraulic fracturing (HVHF) for natural gas. The fracking process is fraught with danger due to failed well casings, radioactive drill cuttings, and radon gas. The extreme energy inputs and methane leakage make fracked gas a greenhouse-gas contributor on par with coal.

IND243-4 Already-beleaguered taxpayers should not be forced to subsidize a pipeline that is primarily designed to facilitate the export of gas by way of potentially-dangerous liquefied natural gas (LNG) terminals.

IND243-5 The money wasted on this ill-conceived project and the associated HVHF would definitely be better spent on energy conservation and renewable energy. A recent study by thesolutionsproject.org and a similar study that was published in the November 2009 and April 2013 issues of Scientific American show how, with existing technology, we could make the transition to 100% renewable energy in a few decades, and save billions of dollars and countless lives in the process.

So, please reject this project. Let's AIM higher!

IND243-1 Comment noted.

IND243-2 See the responses to comments FA4-25 and SA7-4.

IND243-3 The FERC does not regulate hydraulic fracturing associated with the extraction of natural gas in the Marcellus or other shale formations. These activities are regulated by the state and other federal agencies. Additionally, the AIM Project is not the cause of hydraulic fracturing but is in part a response to it and the increasing supply of domestic natural gas across the United States. See also the responses to comments FA4-24 and SA4-4.

IND243-4 See the responses to comments CO15-4 and IND102-3.

IND243-5 See the responses to comments CO7-5 and FL2-2.

IND244 – Kevin Quigley

20140930-5004 FERC PDF (Unofficial) 9/29/2014 7:47:06 PM

IND244-1 Kevin Quigley, Cortlandt Manor, NY.
As a Cortlandt Manor resident, I am strongly AGAINST this proposed project. The proposed gas line will be located in the near vicinity of several schools, public spaces, and private homes. Both the construction and the completed project carries significant health and environmental risk. I'm confident that alternate routes can be found to minimize this risk to the local population.

IND244-2

IND244-1 See the responses to comments SA4-5 and SA4-9.

IND244-2 Comment noted.

IND245 – Ling Tsou

20140930-5006 FERC PDF (Unofficial) 9/29/2014 8:14:56 PM

Ling Tsou, New York, NY.
 I'm opposed to the major expansion to Spectra Energy Corporation's Algonquin natural gas pipeline and compressor stations (Algonquin Incremental Market ATM Project) for the following reasons:

- Public safety risk! Explosions have occurred in both compressor stations and gas pipelines. An explosion at or near Indian Point would be an unimaginable catastrophe.
- High levels of radon, the leading cause of lung cancer among non-smokers in the U.S., will be transported through the pipeline from Pennsylvania's Marcellus Shale.
- Noisy, polluting compressor station expansions proposed for Stony Point and Southeast expose people, pets and wildlife to many tons of highly toxic emissions per year.
- Health effects associated with compressor stations emissions: nosebleeds, headaches, dizziness, skin rashes, respiratory, developmental and neurological problems, breast, kidney and liver cancer.
- Risk to home values! The proximity of the high pressure pipelines and potential for an explosion could negatively impact your property, diminish its value, and reduce your quality of life.
- Public safety risk! Explosions have occurred in both compressor stations and gas pipelines. An explosion at or near Indian Point would be an unimaginable catastrophe.
- High levels of radon, the leading cause of lung cancer among non-smokers in the U.S., will be transported through the pipeline from Pennsylvania's Marcellus Shale.
- Noisy, polluting compressor station expansions proposed for Stony Point and Southeast expose people, pets and wildlife to many tons of highly toxic emissions per year.
- Health effects associated with compressor stations emissions: nosebleeds, headaches, dizziness, skin rashes, respiratory, developmental and neurological problems, breast, kidney and liver cancer.
- Risk to home values! The proximity of the high pressure pipelines and potential for an explosion could negatively impact your property, diminish its value, and reduce your quality of life.

I would urge you not to approve the application for this expansion project.

Thank you.

IND245-1 Section 4.12.1 of the EIS discusses federal safety standards for natural gas pipelines and how these standards are applied in HCAs. Section 4.12.3 of the EIS discusses safety-related concerns and other specific measures that Algonquin has proposed or that we are recommending to further address public safety concerns. See also the response to comment FA4-25.

IND245-2 See the response to comment SA4-4.

IND245-3 See the responses to comments SA4-1, SA4-9, and IND1-3.

IND245-4 See the responses to comments SA4-9 and SA4-10.

IND245-5 See the response to comment LA23-21.

IND245-6 See the response to comment IND245-1.

IND245-7 See the response to comment IND245-2.

IND245-8 See the response to comment IND245-3.

IND245-9 See the response to comment IND245-4.

IND245-10 See the response to comment IND245-5.

IND246 – Larysa Dyrszka

20140930-5049 FERC PDF (Unofficial) 9/29/2014 5:16:44 PM

September 29, 2014

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St. NE
Washington, DC 20426

Dear Ms Bose,

IND246-1 I have reviewed the DEIS for the proposed Algonquin Incremental Market ("AIM") Project:
FERC Docket No. CP14-96-000. Please accept my comments as an individual. I am a board-certified pediatrician,
retired from active practice and with a current focus on health impacts of fossil fuels.

Overview

Compressors release combustion products, nitrogen oxide and volatile organic hydrocarbons. The combustion
products combine with the volatile organic compounds and heat and sunlight to produce ground level ozone. The
EPA has just issued a new report in which they recommend an even greater restriction on produced ozone, to 60-
70 ppb, where the current standard is 75ppb.¹ (Policy Assessment for the Review of the Ozone National Ambient
Air Quality Standards, August 2014)

Accidents can occur at any point of gas production, with releases of air toxins.^{2 3}

Health impacts have been observed among residents living near gas infrastructure.⁴

¹ <http://www.epa.gov/ttn/naaqs/standards/ozone/data/20140829pa.pdf>
² Map of pipeline accidents at ProPublica: <http://projects.propublica.org/pipelines/>
³ Earthjustice spills database: <http://earthjustice.org/features/campaigns/tracking-across-the-united-states>
⁴ <http://www.igm.edu/~media/Files/Activity%20Files/Environment/EnvironmentalHealthRT/2012-04-30/Robinson.pdf> and
http://sape2016.files.wordpress.com/2013/10/air_quality_and_climate_impacts_of_shale_gas_operations.pdf and
<http://www.post-azette.com/news/state/2013/10/06/Marcellus-gas-facilities-near-to-one-another-or-even-linked-are-evaluated-individually-for-pollution/stories/201310060059> and
<http://www.cleanair.org/program/outdoor-air-pollution/shale-gas-infrastructure/milford-compressor-station-air-impacts-co-mmun>

1

IND246-1

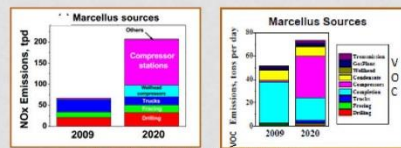
See the responses to comments FA4-24, SA4-1, SA4-9, SA4-10, and CO14-54. We also note that section 4.11.1.3 of the EIS addresses construction emissions and section 4.8.6.2 discusses the handling of PCBs for the Project.

IND246 – Larysa Dyrszka (cont'd)

20140930-5049 FERC PDF (Unofficial) 9/29/2014 5:16:44 PM

IND246-1
(cont'd)

Emissions from compressor stations are significant: 60-75 % of the estimated damages (mostly health problems) from all natural gas activities result from compressor station activities. From the 2013 RAND study of air-quality damages in Pennsylvania <http://opsience.iop.org/1748-9326/8/1/014017>



Graphs adapted from presentation of Dr. Allen Robinson
<http://www.iom.edu/~media/Files/Activities/2012/Files/Environment/EnvironmentalHealthRT/2012-04-30/Robinson.pdf> and video <http://www.iom.edu/Activities/Environment/EnvironmentalHealthRT/2012-04-30/Day-1/Session-5/1-Robinson.aspx>
 see also Clean Air Council's Walker & Koplinka-Loehr presentation
http://www.cleanaire.org/program/outdoor-air-pollution/shale_gas_infrastructure/milford-compressor-station-air-impacts-commun

The volume of emissions from compressor stations is significant. The 2013 RAND study of air-quality damages in Pennsylvania has determined that 60-75 % of the estimated damages (most due to health problems) result from compressor station activities.⁵

Dr. Allen Robinson of the Carnegie Mellon University estimates that the greatest nitrogen oxide and VOC emissions are from compressor stations.⁶

POLLUTANTS and the SOURCES

These are the components of natural gas and pipelines, and the sources of the emissions:^{7 8}

- Methane (CH₄)
- Light and heavy alkanes
- BTEX - Benzene, toluene, ethylbenzene, and xylene
- Hydrogen and carbonyl sulfides
- Sulfur Dioxide (SO₂)
- Formaldehyde and other aldehydes
- Particulate matter (tiny soot-like particles)

⁵ <http://opsience.iop.org/1748-9326/8/1/014017>

⁶ Graphs adapted from presentation of Allen Robinson

<http://www.iom.edu/~media/Files/Activities/2012/Files/Environment/EnvironmentalHealthRT/2012-04-30/Robinson.pdf> and video <http://www.iom.edu/Activities/Environment/EnvironmentalHealthRT/2012-04-30/Day-1/Session-5/1-Robinson.aspx> and see also Clean Air Council's Walker & Koplinka-Loehr

http://www.cleanaire.org/program/outdoor-air-pollution/shale_gas_infrastructure/milford-compressor-station-air-impacts-commun

⁷ http://www.edf.org/sites/default/files/9235_Barnett_Shale_Report.pdf

⁸ <http://www.epa.gov/airquality/oilandgas/pdfs/20120417presentation.pdf>

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- Carbon monoxide (CO)
- VOCs
- Radon, polonium and lead
- Polychlorinated Biphenyls (PCBs)

The infrastructure, including compressor stations, processing facilities, metering and regulating stations and diesel-powered trucks emit the pollutants^{9 10 11 12} listed here.

The exposure is cumulative¹³ and costly¹⁴.

These are some of the health impacts associated with infrastructure emissions:

NOx is associated with respiratory disease. Low levels cause eye, nose, throat & lung irritation; coughing, shortness of breath; tiredness, nausea. High levels of exposure can seriously damage tissues in the throat and upper respiratory tract and trigger the build-up of fluid in the lungs. Additionally, nitrogen oxides also contribute to acid rain and can react with other pollutants to form ozone and particulate matter.^{15 16}

VOCs are neurotoxins, hepatotoxins, reproductive toxins, fetotoxins, and dermatotoxins. Short-term exposure to VOCs can irritate the respiratory tract and eyes and cause dizziness and headaches. Long-term exposure is linked to cancer and a number of adverse neurological, reproductive, and developmental effects. VOCs can also impact health by combining with nitrogen oxides to form ozone.^{17 18}

SO₂ is associated with respiratory illness. At high exposure levels, sulfur dioxide can cause temporary breathing difficulty for people with asthma and long-term exposure to high levels of SO₂ can cause respiratory illness and aggravate cardiovascular diseases. Sulfur dioxide also reacts with nitrogen oxides and other air pollutants to form particle pollution and acid rain, which damages forest and aquatic ecosystems.^{19 20}

Particulate matter also known as particle pollution, is made up of a mixture of solid particles and liquid droplets suspended in the air. While some particles such as dust and soot are large enough to be seen with the naked eye, others are so tiny that they can only be viewed with the aid of a microscope. Produced primarily by the combustion of fossil fuels, particulate matter is one of the deadliest air pollutants. Each year, particle pollution causes an estimated 60,000 premature deaths. Fine particles are especially dangerous because they can bypass the body's natural defenses to lodge deep in the lungs where they can pass easily into the bloodstream.

⁹ <http://www.iom.edu/~media/Files/Activity%20Files/Environment/EnvironmentalHealthRT/2012-04-30/Robinson.pdf> and

<http://www.iom.edu/Activities/Environment/EnvironmentalHealthRT/2012-APR-30/Dav-1/Session-5/1-Robinson.aspx>

¹⁰ http://sape2016.files.wordpress.com/2013/10/aigonquin_incremental_market_project.pdf

¹¹ http://courses.washington.edu/envi300/papers/Steinzer_et_al_2013.pdf

¹² http://sape2016.files.wordpress.com/2013/10/air_quality_and_climate_impacts_of_shale_gas_operations.pdf

¹³ <http://www.post-gazette.com/news/state/2013/10/06/Marcellus-gas-facilities-near-to-one-another-or-even-linked-are-evaluated-individually-for-pollution/stories/201310060050>

¹⁴ Litovitz, Curtright, 2013, "Estimation of regional air-quality damages from Marcellus Shale natural gas extraction in Pennsylvania". Access at http://iopscience.iop.org/1748-9326/8/1/014017/pdf/1748-9326_8_1_014017.pdf and also <http://iopscience.iop.org/1748-9326/8/1/014017>

¹⁵ <http://www.atsdr.cdc.gov/toxfaqs/TF.asp?id=396&tid=69>

¹⁶ <http://www.psr.org/environment-and-health/climate-change/air-pollution/air-pollutants.html>

¹⁷ <http://www.atsdr.cdc.gov/toxfaqs/TF.asp?id=396&tid=69>

¹⁸ <http://www.psr.org/environment-and-health/climate-change/air-pollution/air-pollutants.html>

¹⁹ <http://www.atsdr.cdc.gov/toxfaqs/TF.asp?id=396&tid=69>

²⁰ <http://www.psr.org/environment-and-health/climate-change/air-pollution/air-pollutants.html>

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It contributes disproportionately to human disease, and includes brain lesions resulting in neurobehavioral abnormalities.²¹

With small increases in airborne particulate matter exposure, human risks increase for the following:

- Cardiovascular disease-- heart attacks, strokes
- Respiratory disease-- asthma attacks, lung cancer
- Fetal and neonatal illness.
- Childhood illnesses: Pediatric allergies, ear/nose/throat and respiratory infections early in life, impaired lung development in children that affects lung function in adulthood, asthma, bronchitis, exacerbation of existing asthma and exacerbation of cystic fibrosis.
- Geriatric illnesses: Including exacerbation of chronic obstructive pulmonary disease, congestive heart failure, heart conduction disorders, myocardial infarction and coronary artery disease, and diabetes in the elderly.²²⁻²³

Formaldehyde causes cancer.²⁴ It can "pickle" mucosa...and may cause the irritation of the respiratory tract which is a common complaint near compressor stations.

Polychlorinated Biphenyls (PCBs). Aging pipelines have been found to contain PCBs which the EPA began regulating in the 1970s.²⁵ However, the EPA is in the process of re-assessing those rules.²⁶ Cases of illegal dumping have been reported, which is of concern since PCBs could lead to a variety of illness, including damage to the immune system and fetuses, liver disease and chloracne, an acute form of skin rash, as well as cancer.²⁷ An independent report found that there is no way to completely eliminate PCBs from pipelines and processing facilities.²⁸ There should be a plan for monitoring since there is a chance that PCBs may accumulate in and around the proposed infrastructure.²⁹⁻³⁰

Tons of pollutants, including formaldehyde, polycyclic aromatic hydrocarbons (PAH), benzene, styrene, toluene, xylene, hexane, acetone, and carbon tetrachloride could seep into the soil and the regional watersheds.³¹

(see Presentation by Matt Walker and Sam Koplinski-Loehr, Clean Air Council for Citizens Meeting on the Milford, PA compressor station on July 9, 2014).³²

IND246-2 **RADIOACTIVITY**

For decades we have known shale to be radioactive.

²¹ <http://www.usatoday.com/story/news/nation/2014/06/09/air-pollution-autism-study/10226445/>

²² <http://www.atsdr.cdc.gov/toxfaqs/TF.asp?id=996&tid=69>

²³ <http://www.epa.gov/environment-and-health/climate-change/air-pollutants.html>

²⁴ <http://ntp.niehs.nih.gov/ntp/ntp/twelfth/profiles/formaldehyde.pdf>

²⁵ <http://www.epa.gov/compliance/resources/publications/monitoring/tsca/manuals/pcbinspect/pcbinspectappg.pdf>

²⁶ <http://yosemite.epa.gov/eopel/rulegate.nsf/bvRIN/2070-A138#1>

²⁷ <http://www.nytimes.com/1987/02/26/us/pcb-dumping-by-4-pipelines-reported.html>

²⁸ Papadopoulos et al, 2010. PCBs in the Interstate Natural Gas Transmission System – Status and Trends. Access at

<http://www.ingaa.org/11885/Reports/10722.aspx> and full report at <http://www.ingaa.org/File.aspx?id=10753>

²⁹ <http://www.pca.state.mn.us/index.php/view-document.html?id=17960>

³⁰ <http://www.ingaa.org/78.aspx?CFVreporttype=32>

³¹ http://www.picarro.com/resources/literature_publications/hydrocarbon_emissions_characterization_in_the_colorado_front_ran_0

³² http://www.cleanair.org/program/outdoor_air_pollution/shale_gas_infrastructure/milford_compressor_station_air_impacts_commun

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See the responses to comments FA4-24 and SA4-4.

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The International Atomic Energy Agency and the International Commission of Radiation Protection have recommendations regarding radioactivity at oil and gas mining sites, and most countries which are members adhere to the recommendations. The US is a member but has instead exempted from federal oversight through RCRA (Resource Conservation and Recovery Act) the materials that come from down-hole which are, in many cases, radioactive.³³

EPA region 3 reports that radium, measured as gross alpha and beta, in flowback water and produced waste in Pennsylvania wells is significantly higher than in other shales.

The following graphs are from a USGS report:³⁴

Table 2. Ra-226, Ra-228, gross alpha, and gross beta activities measured in samples of produced water for wells listed in table 1. Analytical uncertainties are included when known.

[TDS, total dissolved solids; mg/L; rad/gross per liter; pCi/L; gross alpha per liter; ND, not detected]

Well/ Sample ID	TDS (mg/L)	Gross alpha (pCi/L)	Gross beta (pCi/L)	Ra-226 (pCi/L)	Ra-228 (pCi/L)	Total radium (pCi/L)	Method, analytical codes					
Source: PA DEP (2008-2010)												
1	54,000			416	22.2	121	8.2	556	0.28	SM2540C; EPA 904.0, 903.0		
2	16,200	14	2	1,322	86	ND	1.8	ND	0.3	SM2540C; 7110C; EPA 904.0, 903.0, 906.0		
3	213,000	19,230	2,843	7,944	1,330	59	1.3	37	3.3	87	0.73	SM2540C; EPA 904.0, 903.0, 906.0
4	61,800	6,150	743	1,325	190	410	11.0	51	8.9	482	0.12	SM2540C; EPA 904.0, 903.0, 906.0
5.1	38,200	454	126	349	78	66	4.0	2.2	0.9	68	0.03	SM2540C; EPA 904.0, 903.0, 906.0
5.2	82,600	1,644	371	785	242	239	9.7	38	6.3	277	0.16	SM2540C; EPA 904.0, 903.0, 906.0
6	40,880	7,212	750	732	16,520	3,280	1,123	227	18,040	0.07	EPA 903.1, 904.0	
7	21,900	4,074	980	737	11,120	2,204	1,287	261	12,407	0.12	EPA 903.1, 904.0	
8	124,000			1,525	110	657	76	2,182	0.43	SM18.2540C; EPA 903.1 Mod.		
9	284,000	11,810	2,482	1,060	759	4,184	789	1,074	202	5,258	0.26	SM20.2540C; EPA 903.1, 904.0
10	157,000			7,310	460	1,180	180	8,510	0.16	SM18.2540C; EPA 903.1 Mod.		
11.1	157,000			951	86	703	69	1,654	0.74	SM18.2540C; EPA 903.1 Mod.		
11.2	200,000			1,280	120	1,110	120	2,390	0.87	SM18.2540C; EPA 903.1 Mod.		
12	83,000	7,530	1,141	2,803	372	562	26	648	67	1,210	1.15	SM18.2540C; EPA 903.0, 903.0, 904.0
13	358,000	16,356	2,186	11,598	723	892	32	3,989	128	3,481	2.90	SM18.2540C; EPA 903.0, 903.0, 904.0
14	1,470	ND	3	78	4	ND	0.31	ND	0.39	1.00	SM2540C; EPA 904.0, 903.0, 906.0	
15	380,000	19,240		7,049		1,368		104		1,074	0.08	SM2540C
16	24,700	318	453	380	900	303	24	108	32	271	1.63	SM2540C; EPA 904.0Mod.; 903.1, 906.0
17	88,500	3,640	1,004	ND	631	1,042	097	298	39	1,340	0.29	SM2540C; EPA 904.0Mod.; 903.1, 906.0
18	116,000	2,320	800	2,077	929	1,037	200	515	97	1,352	0.50	SM2540C; EPA 904.0Mod.; 903.1, 906.0
19	32,500	730	175	81	61	354	104	33	139	359	0.01	SM2540C; EPA 904.0Mod.; 903.1, 906.0
20	43,400	840	213	379	116	66	4.05	1.4	6.3	67	0.02	SM2540C; EPA 904.0, 903.0, 906.0
21	46,440	820	249	505	140	76	2.7	23	2.4	99	0.30	SM2540C; EPA 904.0, 903.0, 906.0
22	47,800	585	163	516	80	36	1.75	2.7	0.2	39	0.68	SM2540C; EPA 904.0, 903.0, 906.0
23	125,100	2,100	631	1,354	335	229	6.8	56	6.5	285	0.25	SM2540C; EPA 904.0, 903.0, 906.0

³³ Recommendations from the International Atomic Energy Agency (IAEA) http://www-pub.iaea.org/MTCD/publications/PDF/TC3-40_web.pdf and Federal exemption <http://www.epa.gov/osw/nonhaz/industrial/special/oil/oil-gas.pdf> <http://pubs.usgs.gov/sir/2011/5135/pdf/sir2011-5135.pdf>

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Table 2. Ra-226, Ra-228, gross alpha, and gross beta activities measured in samples of produced water for wells listed in table 1. Analytical uncertainties are included when known.—Continued

[TDS, total dissolved solids; mg/L; milligrams per liter; pCi/L, picocuries per liter; ND, not detected]

Well/ Sample ID	TDS (mg/L)	Gross alpha (pCi/L)	±/-	Gross beta (pCi/L)	±/-	Ra-226 (pCi/L)	±/-	Ra-228 (pCi/L)	±/-	Total radium (pCi/L)	Ra-226/ Ra-228	Method, method codes
Source: NYSDEC (2008)												
24	70	48	7	54	0.163	0.39	0.029	0.22	0.192	0.175		
25	54.6	37	59	58	0.193	0.16	0.428	0.34	0.623	2.195		
26	3,914	813	75.5	202	1.779	343	301	39	1,960	0.113		
27.1	17,940	8,634	4,765	3,829	2,472	404	874	174	3,346	0.334		
27.2	3,568	1,102	618	599	7,885	1,548	234	51	8,119	0.030		
28	205,446	14,330	3,792	4,361	1,634	2,647	494	782	1,077	3,429	0.285	
29	5,436	2,065	2,780	879	4,040	907	826	160	4,875	0.204		
30	7,978	1,800	1,627	736	5,332	1,051	138	37	5,469	0.026		
31	10,970	2,263	1,170	701	6,125	1,225	516	99	6,641	0.084		
32	30,750	4,117	2,389	861	10,160	2,026	1,252	237	11,412	0.123		
33	205,102	19,230	3,654	302	654	13,310	2,655	929	179	14,439	0.040	
34	16,550	3,255	1,323	711	15,140	2,986	967	181	16,097	0.063		
35	121,000	23,480	12,000	2,940	16,030	2,995	912	177	16,942	0.037		
Source: NYSDEC (1998)												
36					669	88	1,100	250	1,769	1.644	representative	
37					402	68		402			representative	
38					1,164	93	429	27	1,593	0.340	representative	
39					396	64	234	182	632	0.588	representative	
40					239	47			259		representative	
41					409	60			409		representative	
42					413	61	356	222	1,209	2.073	representative	
43					260	43	303	194	963	2.704	representative	
44					63	71			63		representative	
45					169	86	365	234	754	3.343	representative	
46					306	126	368	248	874	1.836	representative	
47					175	100	251	179	426	1.437	representative	
48							347	55	347		representative	
49					290	56	460	172	750	1.536	representative	

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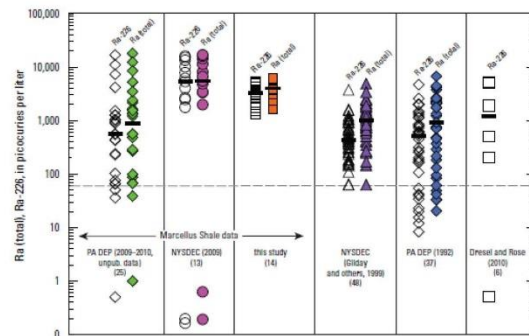


Figure 4. Measured activities for total radium (Ra-226 + Ra-228) and Ra-226 for each of the data sources used in the study. The three datasets for produced water from Marcellus Shale wells are shown on the left; the remaining three datasets are for non-Marcellus Shale wells. The number of points in each dataset is shown in parentheses, and the median values are plotted as heavy black lines. For reference, the dashed line shows the industrial effluent discharge limit (60 pCi/L) for Ra-226 (U.S. Nuclear Regulatory Commission, <http://www.nrc.gov/reading-rm/doc-collections/cfr/part020/appb/Radium-226.html>).

The method measuring Radium 226 and 228 and their progeny has recently received scrutiny, and a new set of methods has been developed by the EPA³⁵. The FPWFHO (flowback and produced water in hydraulic fracturing operations) matrix is considered to be a particularly challenging one due to its extremely high dissolved solids content and its complexity. This new method addresses that complexity.

In brief, the calculations done using the older EPA methods have likely significantly underestimated the radium content of flowback and produced water. Please note that the methods used to detect radium in the USGS report³⁶ (EPA methods 903 and 904) have likely underestimated the radium content because of the high salinity in the samples.

Radon, a gas, has a short half-life (3.8 days) but among its progeny are lead and polonium, and these are toxic and have relatively long half-lives of 22.6 years and 138 days respectively. Lead causes neurologic and hematologic toxicity, and death; polonium causes cancer and death.³⁷ Radon and its radioactive decay products enter the body primarily through inhalation. Most of the radon is exhaled prior to radioactive decay but some of the solid radioactive polonium and lead remain in the lungs and may cause cancer.

³⁵ http://www2.epa.gov/sites/production/files/2014-06/documents/epa-600-r-14-107_-_gross_alpha_-_gross_beta_508_fm_08-08-2014.pdf

³⁶ <http://pubs.usgs.gov/sir/2011/5135/pdf/sir2011-5135.pdf>

³⁷ National Academy of Sciences, 1988 report, Health Risks of Radon and Other Internally Deposited Alpha-Emitters: BEIR IV, page 5

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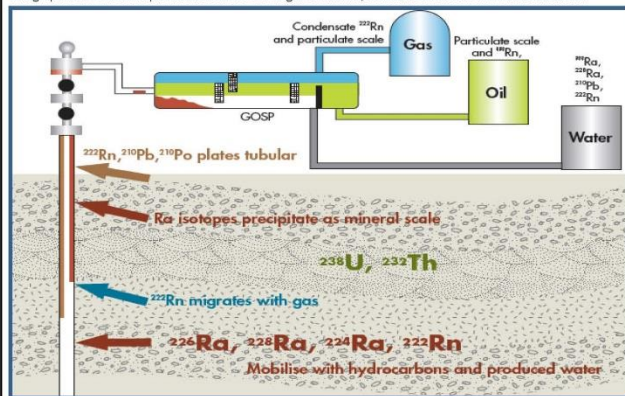
The gas which flows through the pipeline carries gaseous radon with it, and as radon decays within the pipeline, the solid daughter elements, polonium and lead, accumulate along the interior of the pipes. There is a concern that the gas transiting, and being compressed and regulated, will have radioactivity levels which will be a risk not only to the workers at these stations and along the pipeline, but potentially also to the residents.

This is a description from the 2008 publication of the International Association of Oil & Gas Producers:

"During the production process, NORM flows with the oil, gas and water mixture and accumulates in scale, sludge and scrapings. It can also form a thin film on the interior surfaces of gas processing equipment and vessels. The level of NORM accumulation can vary substantially from one facility to another depending on geological formation, operational and other factors. To determine whether or not a facility has NORM contamination, NORM survey, sampling and analysis needs to be conducted. NORM may accumulate, eg at wellheads in the form of scale; at Gas/Oil Separation Plants (GOSP) in the form of sludge; and at gas plants the form of thin films as the result of radon gas decay.

"...radionuclides such as Lead-210 and Polonium-210 can ... be found in pipelines scrapings as well as sludge accumulating in tank bottoms, gas/oil separators, dehydration vessels, liquid natural gas (LNG) storage tanks and in waste pits as well as in crude oil pipeline scrapings." – OGP, "Guidelines for the management of Naturally Occurring Radioactive Material (NORM) in the oil & gas industry" International Association of Oil & Gas Producers, Report No. 412, September 2008.¹⁰

This graph from the same publication shows the origins of NORM, as well as where NORM can accumulate.



¹⁰ <http://www.ogp.org.uk/pubs/412.pdf>

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As radon decays within the pipeline, the solid daughter elements, polonium and lead, accumulate along the pipes. PCBs and other contaminants such as black powder⁴³ and anaerobic microbials do as well^{44, 45}. PIGs (Pipeline Inspection or Intervention Gauge/Gizmo/Gadget⁴⁶) inspect or clean out the pipe, and become repositories of these toxins. These PIGs, with pipe film, black powder, bacteria, scale and sludge, must be removed from the pipeline, stored and eventually disposed.^{43, 44, 45, 47} An industry video of cleaning (with PIGs) can be viewed here⁴⁷

NORM materials may become an inhalation risk when the material is dislodged by mechanical forces, such as wire brushing, pipe rattling etc.⁴⁸

At each step, precautions must be taken to avoid contaminating workers and residents.

The residents in this photo live 50 ft from the compressor station which collects waste in the condensate tanks pictured behind them. The condensate tanks emit air pollutants as they vent.

³⁹ Baldwin, Richard M. "Black powder problem will yield to understanding, planning." Pipeline and Gas Industry 82 (1999): 109-112. <http://muellerenvironmental.com/Documents/100-056-Black%20Powder.pdf> and Baldwin, Richard M. "Black powder control starts locally, works back to source." Pipeline & Gas Industry (1999): 81-87. <http://www.muellerenvironmental.com/Documents/100-058%20Black%20Powder2.pdf>

⁴⁰ Mueller, Fred, and Mark Null. "Impurities in the Gas Stream." Mueller Environmental Designs, Inc. Technical Document, 2005. <http://www.muellerenvironmental.com/public/ProductDocuments.aspx>

⁴¹ Zhu, Xiang Y., John Lubeck, and John J. Kilbane. "Characterization of microbial communities in gas industry pipelines." Applied and environmental microbiology 69.9 (2003): 5354-5363. Access at <http://aem.asm.org/content/69/9/5354.full.pdf>

⁴² <http://en.wikipedia.org/wiki/Pipeline>

⁴³ http://www.rigzone.com/training/insight.asp?insight_id=310&mpc_id=19

⁴⁴ http://www.pigtek.com/advanced_pipeline_cleaning.php

⁴⁵ Tsochatzidis, Nikolaos A., and Konstantinos E. Maroulis. "Methods help remove black powder from gas pipelines." Oil and Gas Journal 105.10 (2007): 52. <http://www.desfa.gr/files/dimosietyes/Tsochatzidis%26MaroulisOGJMa72007.pdf>

⁴⁶ Lindner, Hubert. "A new cleaning approach for black powder removal." Piggings Products and Services Association, 2006. <http://www.ppsa-online.com/papers/2006-Aberdeen-8-Lindner.Pdf>

⁴⁷ <http://www.cleanharbors.com/assets/downloads/videos/video-popup-pipeline-coating.html>

⁴⁸ <http://www.osp.org.uk/pubs/412.pdf>

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COMMUNITY IMPACTS

- IND246-3 We know that there will be air impacts and possibly impacts on water and agricultural land. Homes near the compressor station may be de-valued. Tension within the community will rise. These factors can lead to stress and depression when the social fabric of the community unravels. Workers may be part of the community (or they may be brought in from Texas, Oklahoma, and Louisiana, etc) and they should be protected from hazards such as accidents, noise, radioactivity. A cornerstone of this Industrialization is the truck traffic. It has been described that the gains are often in the form of a short-term boom for a few, but a resultant bust for the community follows.
- IND246-4 Noise can cause Vibro-Acoustic Disease which can lead to heart disease, neurological and gastrointestinal problems, as well as psychological issues.⁴⁹ Noise pollution raises the risk of heart attack and high blood pressure and cognitive deficits in children, and it can interfere with the ability to learn in children, as reported by the World Health Organization.⁵⁰
- There are adverse physical and mental effects from noise.⁵¹ For example, prolonged periods of exposure to 65 dBA can cause mental and bodily fatigue. Noise can affect the quantity and quality of sleep; it can cause permanent hearing damage; and it can contribute to the development or aggravation of heart and circulatory diseases; and it can transform a person's initial annoyance into more extreme emotional responses and behavior.⁵² One example of extreme and sometimes unexpected noise comes from blowdowns.⁵³

⁴⁹ <http://www.citidep.pt/papers/articles/alvesper.htm> and <http://www.fastcompany.com/1744151/air-pollution-causes-europeans-to-lose-16-million-years-of-healthy-living-annually-study>

⁵⁰ http://www.euro.who.int/_data/assets/pdf_file/0008/136466/e94888.pdf

⁵¹ <http://www.earthworkaction.org/noiseresources.cfm#GENERALNOISE>

⁵² Marsh, A. 1999. University of Western Australia, School of Architecture and Fine Arts. Cited in East of Huajatolla Citizens Alliance. *Noise*

⁵³ http://www.transcanada.com/docs/Our_Responsibility/Blowdown_Notification_Factsheet.pdf

- IND246-3 Comment noted. Economic impacts associated with the Project, including property values are discussed in section 4.9.8 of the EIS. Traffic-related impacts associated with construction of the proposed Project are discussed in section 4.9.5 of the EIS.
- IND246-4 Compressor station and blowdown noise is addressed in section 4.11.2 of the EIS. The EIS identifies that compressor station operating noise levels would comply with FERC noise standards (55 dBA Ldn) where noise levels are currently below the FERC criterion, or do not exceed existing noise levels where the current noise levels are above the FERC criterion.

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IND246-5

In these photos air emissions are visible with special infrared cameras. They cannot be seen with the naked eye.

The most common COMPLAINTS associated with O&G activities in people living near compressors include:

- Skin rash or irritation
- Eye irritation
- Gastrointestinal problems such as pain and nausea
- Respiratory problems such as difficulty breathing or cough
- Upper respiratory problems such as congestion, sore throat and nosebleeds
- Neurological problems such as headaches, movement disorders, dizziness
- Psychological problems such as anxiety, depression, stress, irritability

Long-term consequences include:

- Cardiovascular such as heart attack and high blood pressure
- Respiratory such as exacerbation of asthma, COPD
- Neurological such as stroke and cognitive deficits in children
- Birth defects
- Cancer
- Premature mortality

Children and pregnant women are particularly affected in adverse ways by environmental toxins⁵⁴. Children are especially vulnerable to air pollution because their lungs continue to grow and enlarge until about age 18. Plus they breathe faster and are closer to the ground.^{55, 56}

⁵⁴ CEH, 2013, http://www.ceb.org/legacy/storage/documents/Fracking/fracking_final-low-1.pdf

⁵⁵ World Health Organization http://www.who.int/ceb/capacity/Children_are_not_little_adults.pdf

⁵⁶ http://www.who.int/ceb/capacity/Indoor_Air_Pollution.pdf citing Moya J et al. Children's behavior and physiology and how it affects exposure to environmental contaminants. Pediatrics, 2004, 113:996. and American Academy of Pediatrics Committee on Environmental Health. Pediatric Environmental Health, 2nd ed. Etzel RA, Ed. Elk Grove Village, IL: American Academy of Pediatrics, 2003. and Children's Health and the Environment – A global perspective. A resource guide for the health sector. WHO, 2005.

IND246-5

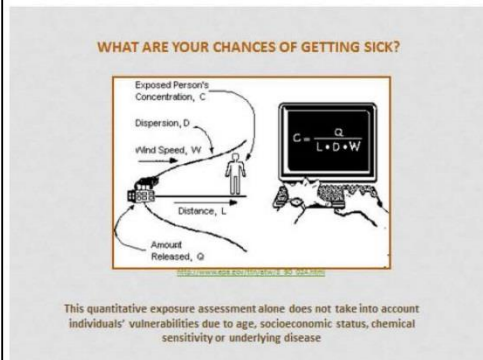
See the responses to comments SA4-1, SA4-9, and SA4-10.

IND246 – Larysa Dyrszka (cont'd)

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IND246-5 (cont'd) Air pollution has also been shown to be associated with birth problems³⁷, lower IQ in babies born to mothers with polycyclic aromatic hydrocarbon exposure during pregnancy^{38,39} and learning disorders in exposed children.

Neurodevelopmental disorders such as autism, attention deficit disorder, dyslexia, and cerebral palsy affect one in six children worldwide, and are increasing in frequency. Industrial chemicals that injure the developing brain are among the known causes for this rise in prevalence. Co-authors of a paper just published in *Lancet Neurology*, Grandjean and Landrigan, write: "Exposure to these chemicals during early development can cause brain injury at levels much lower than those affecting adults, and the real impact on children's health is just beginning to be uncovered."⁴⁰



An exposure assessment considers the chemical and can predict relative risk based on air models which take into account wind direction, quantity released, distance travelled, and dispersion.⁴¹ However, this quantitative exposure assessment alone does not take into account individuals' vulnerabilities due to age, socioeconomic status, chemical sensitivity or underlying disease.

Besides the problem with the air model and exposure equation predicting who will get sick, there is a myriad of other reasons why we don't know who will get sick.

³⁷ Wilhelm at UCLA report on air pollution and premature births
<http://www.environment.ucla.edu/reportcard/article.asp?parentid=1700>

³⁸ Perera, 2009 <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2864932/>

³⁹ Perera et al, 2006. Effect of prenatal exposure to airborne polycyclic aromatic hydrocarbons on neurodevelopment in the first 3 years of life among inner-city children. *Environ Health Perspect.* Doi:10.1287-1292.
<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1551985/>

⁴⁰ Grandjean and Landrigan, "Neurobehavioural effects of developmental toxicity", *Lancet Neurol* 2014; 13: 330-38, doi:10.1016/S1474-4422(13)70278-3. Published Online February 15, 2014. Access online at http://download.thelancet.com/pdfs/journals/laneur/PIIS1474442213702783.pdf?_id=baa17wRR-UT168M5v32zu
http://www.epa.gov/ttn/atw/3_90_024.html

IND246 – Larysa Dyrzska (cont'd)

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IND246-5
(cont'd)

- Most of the literature on health impacts has been published in the last 1-2 years, and usually not in the mainstream general medical literature, and the results have not been considered in the regulatory process
- Federal exemptions limit information at the national level. The oil and gas industry was granted exemptions from key provisions in the major federal statutes intended to protect human health and the environment.⁵²
- Doctors are not adequately trained to recognize, nor do they have time to investigate, environmental exposures
- Community and environmental impacts need attention
- Vulnerable populations, especially children, have not been adequately addressed
- Worker safety needs attention (workers are parents and members of the community)
- Non-disclosure agreements prevent access to health information
- Comprehensive studies which include the infrastructure have not been done

Comprehensive health studies

There is a process which brings public health to the table and which can inform land use decisions and should be used prior to the development of regulations and before permitting. It is particularly important in the case of gas exploration and production.

HEALTH IMPACT ASSESSMENT

"HIA IS A SYSTEMATIC PROCESS THAT USES AN ARRAY OF DATA SOURCES AND ANALYTIC METHODS AND CONSIDERS INPUT FROM STAKEHOLDERS TO DETERMINE THE POTENTIAL EFFECTS OF A PROPOSED POLICY, PLAN, PROGRAM, OR PROJECT ON THE HEALTH OF A POPULATION AND THE DISTRIBUTION OF THOSE EFFECTS WITHIN THE POPULATION. HIA PROVIDES RECOMMENDATIONS ON MONITORING AND MANAGING THOSE EFFECTS."

"IMPROVING HEALTH IN THE UNITED STATES: THE ROLE OF HEALTH IMPACT ASSESSMENT"
http://www.nap.edu/catalog.php?record_id=13229

Where there is political will to be advised by the results, there is a process that could bring public health to the table. However, it should be done prior to the development of regulations and before issuing permits. It is particularly important in the case of gas production because health impacts must be taken into account before deciding whether to go forward with this large land use decision.

An HIA is a process which can be used in any land use decision to determine how human health will be impacted by the specific land use.

The practice of Health Impact Assessment (HIA) elevates the role of health in decision-making.

⁵² <http://www.earthworksaction.org/pubs/PetroleumExemptionsic.pdf> and http://www.citizenscampaign.org/PDFs/cce_hvhf_wp_final.pdf

IND246 – Larysa Dyrzska (cont'd)

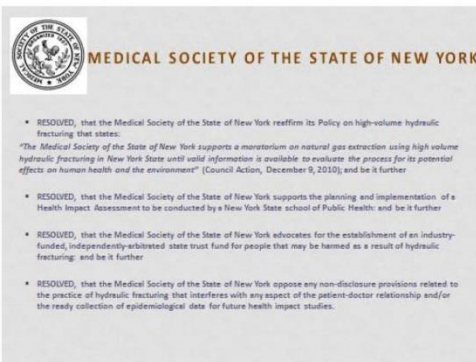
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IND246-5
(cont'd)

It can help create healthier communities by addressing the root causes of many health problems ...and have demonstrated success in a variety of issue areas, ranging from land use and transportation to housing policies, labor standards, natural resource extraction, education and economic policies.

Characteristics of an HIA

- It's prospective, preventive and proactive
- do it before a policy or regulation is implemented
- It focuses on the health consequences of policies
- It identifies vulnerable groups and includes all stakeholders
- An HIA uses data sources that already exist and predicts the impact by considering direct and indirect health risks and solutions
- It is a decision support tool and not intended to simply evaluate a decision after it is made
- It offers recommendations for further study, and recommendations to improve health, and the lead advocates for those recommendations
- It has the potential to save healthcare costs in the long run⁶³



The MSSNY has recommended the use of the HIA in gas development decisions.

They also passed a resolution supporting a policy that limits exposure to radon and its decay products and supporting legislation that protects the public health by ensuring that New York State is committed to reducing sources of excess radon emissions, and monitoring radon gas exposure levels to confirm that these radon gas levels do not exceed the recommended levels set by the EPA.

The current draft EIS is not complete, and the material missing is substantial.

Significant omissions include:

⁶³ http://www.nap.edu/catalog.php?record_id=13229

IND246 – Larysa Dyrszka (cont'd)

20140930-5049 FERC PDF (Unofficial) 9/29/2014 5:16:44 PM	
IND246-5 (cont'd)	<ul style="list-style-type: none">• Adequate attention to health impacts• NORM management Plan• Hazardous Materials Management Plan• Safety-related issues with the Indian Point Energy Center <p>Some of the compendia of health impacts of oil & gas exploration, production and distribution are listed here, and should be studied and included as references in the DEIS:</p> <ul style="list-style-type: none">• PSE for Healthy Energy PSE STUDY CITATION DATABASE on Shale Gas & Tight Oil Development http://www.psehealthyenergy.org/site/view/1180#sthash.CHp8vErJ.dpuf• Concerned Health Professionals of NY Compendium www.concernedhealthny.org• Southwest Pennsylvania Environmental Health Project www.environmentalhealthproject.org <p>It is recommended that a revised, comprehensive and cumulative environmental impact study with a health impact assessment be conducted prior to making the decision about locating this compressor and other infrastructure. Evidence points to significant potential health issues and it would be wise to have all the information before making this decision.</p> <p>That would include:</p> <ul style="list-style-type: none">• Baseline measurements of air, methane and water, and continuous monitoring if compressor is approved. <p>And additionally:</p> <ul style="list-style-type: none">• Cumulative emissions to include condensate tank emissions and fugitive methane;• Best technologies;• Electric compressor instead of gas-powered;• Hazardous Materials Management Plan including plan for disposal of waste from condensate tanks and pipelines. <p>And a NORM management system which should include:</p> <ul style="list-style-type: none">• Organisational responsibilities• NORM monitoring requirements• Workers' protection and training requirements• Requirements to control NORM-contaminated equipment• Requirements to prevent or minimise workplace contamination.
IND246-6	<p>Also, a comprehensive risk analysis of the Indian Point Energy Center needs to be completed and analyzed as part of the EIS.</p> <p>Larysa Dyrszka MD Co-founder Concerned Health Professionals of NY Lar917dy@gmail.com PO Box 355 White Lake, NY 12786</p>

IND246-6

See the response to comment FA4-25.

IND247 – John Louis Parker

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JOHN LOUIS PARKER
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September 29, 2014

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Algonquin Incremental Market Project
Algonquin Pipeline / Spectra Energy
Docket No. CP14-96

Dear Secretary Bose:

IND247-1 I write to comment on the *Draft Environmental Impact Statement* for the above referenced application pending before the Federal Energy Regulatory Commission. The comments are submitted on behalf of the Kopple family of 2998 Stony Street, Mohegan Lake, New York 10547. The *Draft EIS*, at almost 1,000 pages, addresses a proposal of significant geographic scope – construction, maintenance and replacement of a gas pipeline impacting Pennsylvania to Massachusetts. The proposal raises many significant public health and environmental issues yet the Commission has only allowed a less than sixty (60) day time period for public review and public comment. The Commission staff's *Draft EIS* concludes that

Construction and operation of the Project would result in some adverse environmental impacts but most impacts would be reduced to less-than-significant levels. This determination is based on a review of the information provided by Algonquin ...

We developed site-specific mitigation measures that Algonquin would implement to further reduce the environmental impacts that would otherwise result from construction of its Project.¹

¹ Algonquin Incremental Market Project *Draft Environmental Impact Statement*, Algonquin Gas Transmission, LLC, Docket No. CP14-96-000, FERC/ EIS-02541, issued August 6, 2014 ("Draft EIS").

IND247-1

See the responses to comments FA4-1 and FA6-5.

IND247 – John Louis Parker (cont'd)

IND247-2	<p><i>Draft EIS at ES-9 – 10, respectfully.</i> The Commission’s environmental staff has proposed forty-two mitigation recommendations - but seventy-five (75) percent of these recommendations have not been presented to the public in a way that the public can review and make meaningful comments. Adding more reason for concern, Commission Chairman Cheryl A. LaFleur noted in a letter to the Maine House of Representatives that “The final EIS is currently scheduled for issuance on December 19, 2014, and will address any comments received on the draft EIS.”²</p>
IND247-3	<p>Many residents in Westchester, Rockland and Putnam Counties are concerned about the safety issues regarding operation of the Indian Point Nuclear Generating Facility in Buchanan. The concerns were heightened and magnified when the details of the proposed pipeline routing in and through the Indian Point facility became publicly known. Among other concerns is the possibility of catastrophic gas explosion, as witnessed in California, occurring on the Indian Point facility campus and its possible implications for the safety of the spent nuclear fuel ‘temporarily’ stored in the spent fuel pools. As discussed further in this submission, FERC staff working on the <i>Draft EIS</i> in its Recommendations section, point number 42, indicated that the applicant must, “File final conclusions regarding any potential safety-related conflicts with the Indian Point Energy Center based on the Hazards Analysis performed by Entergy.” The public was not able to view or review any of this information for the public comments on the proposal. Indeed, Entergy, which owns and operates these nuclear facilities, had its comments on the <i>Draft EIS</i> submitted today, September 29, 2014 and posted via email at 1:16pm. FERC staff effectively prevented any comment on this issue of critical public importance when it set forth its recommendations in the <i>Draft EIS</i>.³</p>
IND247-4	<p>On September 15, 2014, Commission staff held a public meeting in the Town of Cortlandt Manor to receive public comments on the <i>Draft EIS</i>. The public meeting mimics much of the process thus far under the <i>National Environmental Policy Act</i> review for this proposal. The <i>Draft EIS</i> and the environmental reports submitted by the applicant provide the appearance of process. The public comment hearing similarly provided an appearance of process. The <i>Draft EIS</i>, however, as multiple citizens have noted, is not complete and shields significant amounts of information from public</p>

² Letter of Cheryl A. LaFleur, Chairman, Federal Energy Regulatory Commission to the Honorable Alex Willette, Maine House of Representatives, August 26, 2014.

³ Comments of Entergy Nuclear Indian Point 2, LLC, Entergy Nuclear Indian Point 3, LLC and Entergy Nuclear Operations, Inc. on the Draft Environmental Impact Statement for Algonquin Incremental Market Project, September 29, 2014. See Accession No. 20140929-5183.

2

IND247-2 See the response to comment FA4-1.

IND247-3 See the response to comment FA4-25.

IND247-4 See the responses to comments FA4-1, FA6-5, and SA1-12. A 3-minute time limit was established due to the large number of speakers signed up to speak. The time limit allowed everyone who signed up an opportunity to speak. During the opening remarks, FERC staff recognized that many commentors were likely concerned about similar topics and encouraged speakers to diversify their comments to make best use of the limited time. FERC staff also reminded attendees that they may supplement their comments on the written record, which is given equal weight. Written comment handouts were provided that could be filled out at the meeting and provided to staff or mailed in at a later date.

IND247 – John Louis Parker (cont'd)

IND247-4
(cont'd) review and comment. The FERC *Draft EIS* acknowledges this. The *Draft EIS* is most notable for what it excludes and what it acknowledges was not ready for public review and consideration by the close of the public comment period.

The September 15th public meeting also gave the patina of openness and transparency. As the speaker who drew the number 2 slot to speak, and then was cut off by Commission staff because of an arbitrary three (3) minute speaking rule, I can attest that there was an inability for anything but the most superficial comment. Despite NEPA's clear mandate for public participation in the review process, in this case, the public has been given an incomplete analysis and insufficient time and opportunity to comment on a project that will have significant impacts upon many residents. The public cannot comment on information and analysis not available for their review. For the reasons set forth below, the *Draft EIS* is inadequate as a matter of fact, as a matter of law, and a matter of morality. The Commission must correct these failings and provide to the public a *Supplemental Draft EIS*.

BACKGROUND

IND247-5 On September 10, 2014, we submitted a request to the Commission to extend the public comment period to September 29, 2014 to at least May 29, 2105 – a nine-month extension.⁴ Similarly the record is replete with requests made by residents and elected officials seeking at the minimum a ninety (90) day extension. The Commission has not responded to these reasoned and numerous requests. Further, our September 10, 2014 request noted that “the choices facing the Commission require additional time for public comment review now, or revising the *Draft EIS*, and requiring a new window for public comment when it is re-released” as a *Supplemental Draft EIS*. As the NEPA regulations make clear, at the conclusion of the lead agency's review of the public comments, it shall “assess and consider comments both individually and collectively” and may “modify alternatives including the proposed action,” “develop and evaluate alternatives not previously given serious consideration,” “supplement, improve, or modify its analyses,” “make factual corrections,” or “explain why comments do not merit further agency response.” 40 CFR Part 1504 (a)(1) – (4). There has been no response to this request from the Commission. Further, the Commission as an obligation to provide incomplete or unavailable information to the public as part of the environmental impact statement. 40 CFR Part 1502.22(a).⁵

⁴ Letter of John Louis Parker to Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission, September 10, 2014. See Accession No. 20140911-5020; See also Accession No. 201400915-0031.

⁵ The regulatory provision is directly on point for the *Draft EIS*, stating that “If the incomplete information relevant to reasonably foreseeable significant adverse impacts is essential to a reasoned choice among alternatives and the overall costs of

IND247-5

See the responses to comments FA4-1 and FA6-5. This volume provides individual responses to comments, identifying where the text of the *EIS* has been updated to reflect additional analysis or consideration of alternatives, or where comments are not considered further.

IND247 – John Louis Parker (cont'd)

IND247-6	<p>On June 30, 2014, we submitted detailed comments to the Commission noting a number of environmental issues that needed to be addressed, but were not.⁶ These include the unique environmental value of the Granite Knolls West Parkland in Yorktown, the possible contamination of New York City's Croton Reservoir, community character issue of open space, public health impacts, segmentation of the review by excluding the Atlantic Bridge proposal of the applicant, and a missing risk assessment for a catastrophic incident. The submission also requested that the Commission require a</p>	IND247-6	<p>Updated information regarding the potential impacts of the Atlantic Bridge Project has been incorporated into the cumulative impacts evaluation in section 4.13 of the EIS. The Croton Watershed is addressed in section 4.3 of the EIS. Algonquin is no longer proposing a pipe and contractor ware yard within Granite Knolls West. Section 4.8.5.1 and table 4.8.1-1 of the EIS have been revised accordingly. See also the responses to comments FA3-5 and SA4-10.</p>
IND247-7	<p>number of additional steps be taken as part of the NEPA analysis. These included an assessment of pipeline facilities located nearby population centers and community assets to see what can be relocated and independent environmental compliance monitors. The relocation assessment has not been required or completed and there are no details available regarding the compliance monitors – details that are critical to understanding if such monitors are actually independent.⁷</p>	IND247-7	<p>Section 1.1 of the EIS describes the purpose of the Project and section 1.2.1 of the EIS identifies that the Commission is responsible for evaluating applications for authorization to construct and operate interstate natural gas pipeline facilities. Reconsideration of the siting of existing infrastructure is outside of the scope of this EIS. See also the responses to comments SA4-5 regarding safety impacts and SA4-16 regarding the environmental compliance monitoring program.</p>
IND247-8	<p>Consensus has been reached by the public on the need for a more detailed and transparent review by the Commission. In addition to the concerns of local residents, the elected officials of Westchester County, through the Board of Legislators, similarly asked for a more comprehensive analysis of the pipeline proposal including requests for an independent air emissions baseline assessment, advanced notification for all planned blowdowns, a comprehensive and transparent Health Impact Assessment pursuant to the Centers for Disease Control and the National Academy of Sciences standards, that the NEPA review meet the more stringent requirements of the New York State Environmental Quality Review act, and that no construction or maintenance facilities be located near schools, parks, houses of worship, business or residential districts, or any other populations centers. Similar request have been submitted by numerous Towns and Cities, and by elected officials throughout the pipeline pathway. The reasonableness of the requests is underscored by the fact that the entire Westchester County area is currently a marginal non-attainment areas under the Clean Air Act eight (8) hour ozone standard.</p>	IND247-8	<p>See the responses to comments SA4-3, SA4-5, SA4-9, SA4-10, and SA4-15.</p>

obtaining it are not exorbitant, the agency shall include the information in the environmental impact statement." 40 C.F.R. Part 1502.22(u). This is also true for the studies and assessments requested for health impacts assessments, air emissions baseline assessments, and the assessment and evaluation of what pipeline infrastructure could be moved as part of the construction and modification proposal.

⁶ Letter of John Louis Parker to Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission, June 30, 2014. See Accession No. 20140702-5012.

⁷ The Westchester County Board of Legislators, which represents one million (1,000,000) residents of the County submitted Resolution No. 80-2014 to the Commission making similar requests for additional review and assessment of the pipeline proposal. See Accession No. 201400903-0014.

4

IND247 – John Louis Parker (cont'd)

IND247-9

SIGNIFICANT SUBSTANTIVE SECTIONS OF THE ENVIRONMENTAL REVIEW OF THE DRAFT EIS ARE NOT AVAILABLE FOR PUBLIC COMMENT.

As we indicated to the Commission on September 10, 2014, the Conclusions and Recommendations in the *Draft EIS* include the Commission's environmental staff's numerous requests and additional requirements on the applicant. The staff concludes that

if the proposed Project is constructed and operated in accordance with applicable laws and regulations, the mitigating measures discussed in this EIS, and our recommendations, most of these adverse impacts would be reduced to less than significant levels.

Section 5.1, Draft EIS at 5-1. The FERC environmental staff reached many conclusions on the resources impacted by the proposal, including: geology and paleontology, soils, water, wetlands, vegetation, wildlife aquatic, cultural, air quality, and noise, among others. *Id at Sections 5.1.1 - 5.1.14.* The FERC staff's mitigation recommendations were with the issuance of the *Draft EIS*. There are many key issues and concerns raised by the FERC staff. In fact, there are forty-two (42) individual recommendations many of which include subsections with additional issues and details.

A significant amount of vital environmental impacts information was not required to be submitted by the applicant *until the public comment period ended*. These issues identified by FERC staff include:

- 14. File site-specific crossing plan for Catskills aqueduct (include: location, proposed construction methods, timing of construction, mitigation measures, documentation of consultation with NYCDEP)
- 16. File additional details describing how it will minimize trench dewatering
- 18. Prior to end of Draft EIS comment period, file site-specific information regarding location of wetlands meeting criteria of non-saturated condition
- 22. File survey results for Indiana and northern long-eared bats, including mitigation and avoidance measures
- 23. File consultation with New York and New England field office of Fish and Wildlife Service regarding migratory birds
- 24. File updated consultation with FWS regarding bald eagle

IND247-9

See the response to comment FA4-1.

IND247 – John Louis Parker (cont'd)

IND247-9
(cont'd)

27. Prior to end of draft of EIS comment period, file revised Residential Construction Plan that:
 - a. Incorporate additional site-specific details, including measures to minimize traffic
 - b. For residence located within 10 ft. of construction in NY or CT, revise construction work plan to be greater than 10 ft. from residence or justify why work space within 10 ft. of residence
29. File site-specific plan for St. Patrick's Church, Buchanan-Verplanck Elementary, Dodd Stadium, Gonzalez Field, including:
 - a. Detail on location of facilities relative to construction
 - b. Description of construction activities occurring adjacent to site
 - c. Timing of construction activities
 - d. Details on timing of construction relative scheduled games
 - e. Description of construction method used
 - f. Specific measures to minimize impact on facility users
 - g. Documentation of consultation with facility officials
30. File proposed construction schedule for Norfolk Golf Club to minimize impact on club users and documentation of consultation with club owner
31. File results of consultation with National Grid and detailed routes of variations agreed upon (St. Theresa), including:
 - a. Details on location of facilities relative to construction
 - b. Description of construction activities occurring on site
 - c. Timing of construction activities
 - d. Specific measures that would be implemented to minimize conflict
 - e. Documentation of consultation with parish leader
33. Prior to end of Draft EIS comment period, file revised Procedures Guiding the Discovery of Unanticipated Cultural Resources and Human Remains incorporating Connecticut SHPO comments
35. Provide update regarding air permit requirements associated with new/existing M&R stations (NY, CT, MA)
36. File Fugitive Dust Control Plan that specifies the precautions to minimize emissions from construction activities, such as:
 - a. watering the construction workspace and access roads;
 - b. providing measures to limit track-out onto the roads;
 - c. identifying the speed limit that Algonquin would enforce on unsurfaced roads;
 - d. covering open-bodied haul trucks, as appropriate;
 - e. clarifying that the EI has the authority to determine if/when water or a

IND247 – John Louis Parker (cont'd)

IND247-9
(cont'd)

- palliative needs to be used for dust control; and
- f. clarifying the individuals with the authority to stop work if the contractor does not comply with dust control measures

42. File final conclusions regarding any potential safety-related conflicts with the Indian Point Energy Center based on the Hazards Analysis performed by Entergy; If not yet complete, Algonquin shall provide an update on its status and a schedule for anticipated completion. If, additional mitigation measures are required to address safety-related issues or conflicts, prior to construction in the vicinity of the IPEC facility, Algonquin shall file for review and written approval by the Director of OEP, a site-specific construction and mitigation plan for the IPEC developed in consultation with Entergy.

In addition, there are several analyses and important additional information that are required to be submitted by the applicant to FERC *prior to the commencement of construction.*

3. Algonquin must file affidavit statement that all personnel have or will be trained on environmental mitigation measures
4. Algonquin must make known authorized facility locations supplemented with alignment sheets to scale
5. File with Secretary detailed alignment sheets, maps, and areal photographs to scale, approval by Director of OEP of each must be requested in writing before construction require for:
 - a. Implementation of cultural resource mitigation measures
 - b. Implementation of endangered/threatened/special species mitigation measures
 - c. Recommendation by state regulated authorities; and
 - d. Agreements with individual landowners
6. File Implementation Plan w/in 60 days of acceptance of Certificate and receive written approval from Director of OEP. Plan should identify:
 - a. How Algonquin will implement construction and mitigation procedures
 - b. How Algonquin will incorporate requirements into contract bid documents, construction contracts, and construction drawings
 - c. Number of EIs assigned per squad; How Algonquin will ensure number of personnel sufficient for mitigation
 - d. Company personnel who will receive copies of material
 - e. Location and dates of environmental compliance and training
 - f. Company personnel having compliance responsibility

IND247 – John Louis Parker (cont'd)

IND247-9
(cont'd)

- g. Procedures if non-compliance is to occur
- h. For each discrete facility, Gantt chart and dates for:
 - i. Completion of all required surveys and reports
 - ii. Environmental compliance training of on site personnel
 - iii. Start of construction
 - iv. Start and completion or restoration
- 9. Algonquin must file with Secretary documentation that all applicable authorizations required by law were received
- 12. File with Secretary detailed alignment sheets, maps, and areal photographs to scale, approval by Director of OEP of each must be requested in writing before construction require for:
 - a. Implementation of cultural resource mitigation measures
 - b. Implementation of endangered/threatened/special species mitigation measures
 - c. Recommendation by state regulated authorities; and
 - d. Agreements with individual landowners
- 15. Prior to construction of Interstate 84/Still River HDD, file revised site-plan for crossing if additional measures needed regarding Ridgebury Road
- 17. Prior to construction near vernal pools, file revised site-specific crossing plan, including avoidance and mitigation measures
- 19. Prior to construction in NY and CT, file final Compensatory Mitigation Plan
- 20. Prior to construction of the Haverstraw to Stony Point take up and Relay segment, file site-specific plan for Harriman State Park including avoidance and mitigation measures
- 21. Not being construction until:
 - a. FERC receives comments from FWS regarding BA
 - b. FERC completes consultation with FWS
 - c. Algonquin receives written notification from Director of OEP
- 25. Prior to construction in NY, file all survey results on timber rattlesnake habitat, permit requirements, avoidance and mitigation measures
- 26. Prior to construction in CT, file all survey results for state-listed species in CT, conservation plans, and documentation on correspondence with CTDEEP

IND247 – John Louis Parker (cont'd)

IND247-9 (cont'd)	<p>28. Prior to construction of Stony Point or Yorktown Take-up, or Relay segment, file documentation of concurrence of NYSDOS that Hudson River Crossing is consistent with NY coastal policies</p> <p>32. Prior to construction in NY, file for Revised Traffic Management Plan in NY Pipeline Segment (site-specific plans for: Zachary Taylor St., Gate Hill Rd., Bleakley Ave., Route 9A, Montrose Station Rd., Maple Ave., Cordwood Rd.)</p> <p>41. Prior to construction of the Stony Point to Yorktown Take-up and Relay segment, Algonquin shall file with the Secretary its final AC/DC interference study associated with the West Point Transmission Project, documentation of all consultations with WPP, and any additional mitigation measures to address safety-related issues.</p> <p>Even a cursory review of the FERC record on the <i>Draft EIS</i> demonstrates that many of these issues that were unable to be reviewed by the public were in fact issues of great public interest and concern regarding the pipeline application. The public being prevented from having any access to this information illustrates the failure of the public NEPA process. The public cannot comment on issues of great public importance and significant environmental impact, from safety conflicts with the Indian Point Nuclear Generating facility to air quality to wetlands to endangered species.</p>
IND247-10	<p>LOCAL ISSUES IN YORKTOWN</p> <p>4.5.4.3 Construction Ware Yard</p> <p>Several sections of the <i>Draft EIS</i> indicate that Spectra/Algonquin is planning a construction ware yard over fifteen (15) acres on town-owned land in the Granite Knolls West parkland in Town of Yorktown and that "Algonquin is working with the Town of Yorktown on the temporary use of this property during construction."</p> <p>In that regard, FERC should be advised of the following:</p> <p>The <i>Draft EIS</i> refers to the land in question as "open space." However, it should be noted that in New York State there is a legal difference between the terms "open space" and "parkland." Granite Knolls West, in fact, has been officially designated "parkland," and as such is subject to restrictions set down in New York State Law. Before any use of parkland can be used for a non-parkland use, such as a construction ware yard, two things must occur:</p> <p style="padding-left: 40px;">The Town Board of the Town of Yorktown must send a "home rule" message to the state legislature requesting that the parkland be alienated, and</p> <p style="padding-left: 40px;">Both houses of the state legislature must approve alienation bills.</p>

IND247-10

Algonquin is no longer proposing a pipe and contractor ware yard at this location. Section 4.8.5.1 and table 4.8.1-1 of the EIS have been revised accordingly.

IND247 – John Louis Parker (cont'd)

IND247-11	<p>To date, NO acceptable home rule message has been approved by the Town Board of the Town of Yorktown and, given the widespread opposition from town residents to the construction yard, and the further attempt to alienate one acre of land permanently for a launcher and receiver station for the industrial and potentially toxic activity known as "pigging," it is highly questionable whether any such a resolution will be approved by the Town Board in the near future.</p> <p>The New York States Legislature won't be able to approve the parkland alienation without the required home rule message. There is be no legislative authority that would permit Algonquin to use the over fifteen (15) acres of Town of Yorktown land for a construction ware yard. Therefore, FERC should note that this aspect of the Algonquin plan will need to be revised and, as such the <i>Draft EIS</i>. It should also be noted that the Spectra discussions with the Town of Yorktown on the use of the parkland have been limited to the town supervisor, one of five equal members of the Town Board that is the governing body of the Town of Yorktown. New York Town Law requires Town Board approval for agreements involving the use of town owned land.⁸</p> <p>4.8.5.1 New York</p>
IND247-12	<p>This section notes that a new launcher/receiver and pressure regulator facility (aka pigging station) will be constructed on town-owned land in the Town of Yorktown. However, as part of the alienation package that Yorktown has been negotiating secretly -- without a single public information session or a public hearing on its attempt to alienate parkland held in the public trust -- in addition to the fifteen (15) plus acres Yorktown has previously proposed to alienate temporarily, it also proposes to permanently alienate one acre of land for a "pigging" station. While the pigging station language was not removed from the Town's final draft of its pipeline resolution, the Supervisor <i>did</i> remove language that called for other potentially dangerous industrial processes to be excluded from Yorktown. This language was removed at 12:00 midnight when a packed meeting room had emptied, right before the vote on the resolution.</p>
IND247-13	<p>With encouragement and assistance from the applicant, in return for the alienated land, the Town expects to have the applicant construct a massive sports complex that will decimate a beautiful parcel of parkland that is part of a regionally recognized greenway. By alienating the land to the applicant, the Town and the applicant would effectively avoid a New York state environmental review that is more stringent than NEPA. With regard to the planning, negotiations, and other matters surrounding both the applicant's use of alienated land and the Town's planning for the massive sports complex, we have been unable to obtain records under the New York State Freedom of Information Law process. In the end, in addition to the myriad of ways <i>the Draft EIS</i> is</p>

⁸ See New York Town Law § 29(11).

IND247-11 The proposed launcher and receiver would be located entirely within Algonquin's existing right-of-way; therefore, no new permanent easement would be required within Granite Knolls West. Section 4.8.5.1 and table 4.8.1-1 of the EIS have been revised accordingly. See also the response to comment SA4-14.

IND247-12 See the responses to comments SA4-14, IND247-10, and IND247-11.

IND247-13 We recognize that negotiations may have occurred early in the review process regarding the construction of a sports complex to replace disturbed workspace for the Project that may require alienation. However, the Project no longer includes the contractor ware yard or launcher/receiver outside of the existing right-of-way. Therefore, we are unaware of any current plans to construct a sports complex.

IND247 – John Louis Parker (cont'd)

IND247-13 (cont'd)	<p>incomplete, the efforts to alienate parkland by the Town of Yorktown and the applicant shed light on a significant and fundamental flaw: the <i>Draft EIS</i> simply does not account for local issues that must be addressed even in light of potential future federal pre-exemptions issues. The concerns about the use of this parkland are manifest and must be addressed by Commission.⁹</p> <p>The issues regarding the parkland and the requirement for New York State Legislative authorization apply to this issue as well.</p> <p>4.3.2.1 Incomplete Stormwater information</p>
IND247-14	<p>As noted in this section of the <i>Draft EIS</i>, the construction ware yard is located within the Croton Watershed, a part of New York City's drinking water supply. The City of New York has raised concerns about the applicant's SWPPP for the proposal and requests additional information, particularly regarding the use of the Granite Knolls West parkland.¹⁰</p> <p>4.13 Cumulative impacts</p>
IND247-15	<p>Regarding the Atlantic Bridge project, which will involve the expansion of the existing pipeline through the rest of Yorktown – beginning as the AIM pipe runs under the road (Stony Street) from Granite Knolls West and onto the Kopple property, and now named Atlantic Bridge. It is clear from the documents received from the applicant that the company is planning for the Atlantic Bridge project. This is one of many projects regarding pipelines that is currently advancing. These include Spectra's "Maritimes & Northeast" pipeline and the Iroquois Gas "South-to-North ("SoNo") Project" will be capable of delivering gas from the AIM project to proposed Canadian export terminals rather than to end users in New England.</p> <p>A clear record exists indicating that Spectra has already begun planning the project as the Kopples have received letters acknowledging as much and Kopple family representatives have spoken to Spectra Energy about the Atlantic Bridge project more than once. In fact Spectra has flagged the Kopple property, which is already host to two existing pipelines. It seems both improbable and ironic that on the very day the comment period ends for the AIM project, September 29, Spectra/Algonquin is hosting an information session in Yorktown concerning the Atlantic Bridge project. It is clear that the potential impacts from the Atlantic Bridge project must be included in the AIM</p>

⁹ Letter of Mark Michaels to Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission, September 28, 2014. See Accession No. 20140929-5058.

¹⁰ Letter of Cynthia Garcia, SEQRA Coordination Section, New York City Department of Environmental Protection to Kimberly Bose, Secretary, Federal Energy Regulatory Commission, September 29, 2014. See Accession No. 20140929-5293.

IND247-14 See the response to comment SA14-1.

IND247-15 See the response to comment FA3-5.

IND247 – John Louis Parker (cont'd)

IND247-15 (conf'd)	Draft EIS in order to avoid segmentation of the two projects and their cumulative impacts.
IND247-16	In addition to the above comments, the Kopples support the resolution submitted by the Town of Yorktown requesting additional health and safety risk assessments and mitigation measures as originally proposed. ¹¹

¹¹ *Town of Yorktown Resolution*, September 2, 2014. See Accession No. 20140909-0047. As originally proposed from page 3 of proposed resolution

FURTHER RESOLVED, that the Town of Yorktown opposes any construction of **maintenance facilities** located near schools, parks, houses of worship, business or residential districts or any other population centers; and be it

FURTHER RESOLVED, that Algonquin and Spectra shall not take any property from anyone that is not a willing seller and only after fair market is properly determined. The company shall not compel the sale of property by any process such as eminent domain; and be it

FURTHER RESOLVED, that no town owned or controlled property shall be used by Algonquin or Spectra in any way. That the property in the public trust for the people of the Town of Yorktown, such as parkland which has been purchased for the people of the Town for the original purpose of being parkland, shall not be changed by any legal process; and be it

from page 5 of proposed resolution

FURTHER RESOLVED, that the Town of Yorktown opposes any new construction of **maintenance facilities** or expansion of existing maintenance facilities, including but not limited to launcher/receiver sites, M&R stations, and MLV sites, located on environmentally sensitive land near schools, parks, houses of worship, business or in residential districts or any other population centers; and be it."

12

IND247-16

See the response to comment SA4-10. Reliability and safety aspects of the Project are discussed in section 4.12 of the EIS.

IND247 – John Louis Parker (cont'd)

CONCLUSION.

IND247-17 The Commission does not have many legal options. The *Draft EIS* is inadequate to address the myriad of legitimate and well-reasoned concerns of the public. The public has repeatedly pointed out these omissions. So has the Commission's environmental staff. The mitigation measures recommended by FERC staff rely upon additional work and analysis that was not completed as part of the *Draft EIS* circulated for public review. Some of the proposed mitigation efforts will be reviewed and analyzed *after* project approval. Many significant public health, safety, and environmental issues have effectively been removed from public review and public scrutiny during the public comment period. There is significant information that the *Draft EIS* identifies as not available for public review. Indeed, the *Draft EIS* should be completed, revised, and resubmitted to the public for review and comment when completed.

The pending pipeline proposal will impact millions of Americans. The residents directly in the pathway of the pipeline have significant knowledge of local environmental issues and public health concerns as do their elected officials. The numerous omissions from the *Draft EIS* renders it ineffectual and not in compliance with NEPA. The public has a right to review and consider all of the issues identified as concerns or mitigation proposals from the proposal – in this case important work was not due to FERC until the close of the public comment period or before construction commences. Allowing all of this information to avoid public scrutiny is plainly unacceptable and violates federal law. The Kopple family has the dubious distinction of living along the pipeline right of way – and are at the epicenter of a second major proposal – for the Atlantic Bridge segment of the pipeline. Segmentation of these pipeline projects into pieces violates federal law and the AIM and Atlantic Bridge proposal nexus at the Kopple property clearly exemplifies the adverse impacts that result from segmentation.

The Commission can and is required to do better in this NEPA review. The sheer volume of what needs to be completed at the request of Commission staff, and the significance of the issues involved – from air permitting issues, to wetlands, to endangered species, to Indian Point safety issues, among others, meets the requirements for a *Supplemental Draft EIS*. Many substantive and critical pieces of information regarding the proposed pipeline have not been made available, and when finally provided to the public, would constitute new information. The residents along the right of way and in surrounding communities have many reasons to be concerned with this proposal. The Commission has the power, responsibility, and legal obligation to correct the record, have it supplemented, and put that new work out for public review and comment.

IND247-17 See the responses to comments FA4-1, SA1-12, and FA3-5.

IND247 – John Louis Parker (cont'd)

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Please let me know if you have any questions or require additional information regarding this request.

Respectfully submitted,


John Parker

Attorney for Barbara Kopple
Town of Yorktown, New York

IND248 – Dana Goodman

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Comments on Project Docket CP14-96-000

Compiled and submitted by Dana Goodman, Burrillville resident and Sierra Club member

Note: In the following commentary notes please understand that "C:" denotes the Comment addressing the previous quote from the document.

- IND248-1 Opening Letter, Pg. 2: "Abandon compressor units for a total of 10,800 horsepower at one compressor station in NY"
C: Abandon how? Reuse of land? Remediation of destroyed habitat?
- IND248-2 Executive Summary, Pg. 2: "We 2 held four public scoping meetings in the AIM Project area to solicit and receive comments on environmental issues associated with this Project. The meetings were held September 30, 2013 through October 3, 2013 in the Town of Cortlandt, New York; Danbury and Norwich, Connecticut; and the Town of Dedham, Massachusetts."
C: RHODE ISLAND was NOT considered in these preliminary scoping meetings, and therefore the public stakeholders in RI have not been given equal time to consider and provide comments on the proposed Project. If these meetings were held in 2013 and the first hearing in RI was in 2014 during the same month (September), then a public scoping meeting should be held in Rhode Island and stakeholders should be given one year to comment, based on the time allowed the other four states in which the proposed Project will be constructed. During this time, the Project should not be allowed to proceed with the permitting process until one year has passed and Rhode Island stakeholders have had equal time to consider and comment on the Project.
- IND248-3 ES-4: "Algonquin proposes to provide compensatory mitigation for the permanent conversion of forested wetlands to a non-forested wetland type. We are recommending that Algonquin develop a final Compensatory Mitigation Plan in consultation with the USACE, the NYSDEC, and the CTDEEP. We are also recommending that Algonquin identify any additional avoidance or mitigation measures for the two vernal pools through the permit review process with the applicable agencies, prior to construction."
C: Specific measures?
- IND248-4 ES-6: "Construction of the Project would result in minor beneficial socioeconomic impacts due to increases in construction jobs, payroll taxes, purchases made by the workforce, and expenses associated with the acquisition of material goods and equipment. Operation of the Project would have a minor to moderate positive effect on the local governments' tax revenues due to the increase in property taxes that would be collected from Algonquin."
C: Construction workers and Algonquin advocates argue that this project will benefit RI state economy to the point that we NEED this project to create jobs. According to this report only 76 temporary jobs will be created for a period of 8 months. This temporary boon to the economy is insignificant compared to potential long term negative

- IND248-1 Some of the compressor units themselves would be abandoned within the existing compressor building. It would not change the availability of land or change the current use of the overall compressor station site.
- IND248-2 See the responses to comments FA1-1, FA4-1, and FA6-5. Section 1.4 of the EIS also identifies the open house meetings sponsored by Algonquin, which FERC staff attended to collect scoping comments and introduce the FERC process. These meetings included two meetings in Rhode Island in August and September 2013. The Notice of Intent, issued on September 13, 2013 for the Project that announced the scoping process included the affected landowners and federal, state, and local agencies in Rhode Island.
- IND248-3 See the responses to comments FA3-3 and LA23-24.
- IND248-4 Economic impacts associated with the Project, including projected workforce numbers and economic benefits are discussed in sections 4.9.1 and 4.9.9 of the EIS, respectively. See also the response to comment IND233-17.

IND248 – Dana Goodman (cont'd)

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IND248-4 (cont'd)	effects of the Project on disturbed habitat, including air quality, water quality and noise pollution which will affect residents for the lifetime of the facility.
IND248-5	<p>ES-9: "We also considered the feasibility of electric-driven compressor units in lieu of gas-fired units at each of the existing compressor station sites. We concluded that use of electric-driven compressor units would result in additional environmental impacts due to the installation of non-jurisdictional facilities such as electric transmission lines and substations. Although electric-driven units would result in lower operating emissions, Algonquin would be required to comply with its existing air permits at each site. For these reasons, electric-driven compressors would not be preferable to or provide a significant environmental advantage over the proposed Project."</p> <p>C: Does this conclusion factor in EPA standards for Best Available Technology (BAT) requirements? Why not try to achieve the lowest operating emissions possible? If Spectra Energy is promoting Natural Gas as a "CLEAN" alternative to other fossil fuels, isn't it hypocritical not to reduce emissions as much as possible, wherever possible? Why would the public believe that Spectra cares about providing a cleaner fuel if they value profit and cost-saving over a technology that releases fewer emissions and is highly technologically feasible? Also, here, the company is admitting that gas-fired units, (e.g. their OWN product, GAS) are dirtier than electric driven units. How can Spectra then say they are providing a cleaner option, when they are admitting their product produces excessive emissions?</p>
IND248-6	<p>Section 2.2.2., Pg. 2-14: "At the Chaplin, Burrillville, and Southeast Compressor Stations, these wooded temporary workspace areas would be cleared for use during construction and allowed to naturally revegetate following post-construction restoration."</p> <p>C: Natural revegetation of any disturbed area may result in an onset or takeover of more competitive, invasive species, as is extremely common in the spread of <i>phragmites australis</i> in wetland areas disturbed by construction. Spectra should be held responsible for the revegetation of these areas with native species and should be required to record the number of trees removed and to replace each felled tree. Also, Spectra should be responsible for providing the finances to employ an environmental habitat professional to assess the success of the revegetation process for at least 5 years, to ensure the re-establishment of healthy forest biodiversity.</p>
IND248-7	<p>Section 2.3.1.1, Pg. 2-24: "The pipeline is coated to prevent corrosion. The pipe lengths would be coated (usually with a heat-applied epoxy) at a coating mill prior to being delivered to the Project. The ends of each piece are left bare to allow for welding. After welding, the weld area is field coated by the coating crew. Because pipeline coatings are electrically insulating, the coating is inspected using equipment that emits an electric charge to ensure there are no locations on the pipeline with a defect in the coating."</p> <p>C: Exactly which chemicals make up the material of the epoxy coating? What safeguards or regulations are in place, or will be put into practice to ensure that chemicals from the epoxy coating of the pipeline do no leak into surface soils and contaminate soil or groundwater?</p>

IND248-5

Section 4.11.1.2 of the EIS identifies the facilities that are currently subject to BACT under the PSD air permitting program, and those facilities that would require a modification or new permit under this program. We note that BACT under the air permitting program is not an analysis of the lowest emissions achievable. Section 3.4.6 of the EIS provides the detailed discussion (i.e. not the summarized conclusion of the Executive Summary) of the zero emission option of electric driven units. This option would result in additional impacts on other resources and is not considered further. Natural gas is considered a cleaner option for operating the compressor stations over other fuel options (e.g. diesel and fuel oil).

IND248-6

Comment noted. See the response to comment FA3-4 for information on invasive species management.

IND248-7

The exact chemical make-up differs depending on which type of epoxy coating is selected for the pipeline. This coating is bonded to the pipe (typically heat or fusion bonded). This bonding would occur at the pipeline coating mill. To prepare an epoxy coating, the external surface of the pipe is thoroughly cleaned, the pipe is heated to a prescribed temperature, and the epoxy powder is applied. The powder fuses with the heated pipe and forms a water-tight barrier. Once the epoxy coating is applied, it becomes part of the pipe. The pipeline would have to be heated to the extreme temperature used to apply the coating for the coating to un-fuse from the pipe and potentially contaminate soil and groundwater. These coatings are an industry norm and have safely been used for years.

IND248 – Dana Goodman (cont'd)

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IND248-8 Section 3.1, Pg. 3-2: "Alternatively, customers of the Project Shippers could seek to use alternative fuel or renewable energy sources, which could require new facilities. In either case, construction of new pipelines or other energy infrastructure would result in environmental impacts that could be equal to or greater than those of the Project. For these reasons, the no-action alternative would not be preferable to or provide a significant environmental advantage over the Project."

C: With sound understanding that the FERC's responsibility is to regulate proposed interstate projects that transmit electricity, oil and gas, and that some actions are outside the scope of FERC's responsibilities, I still must comment that the "No-Action Alternative" reads as a conclusive statement in support of the Project proprietors and Shippers, without providing a truly unbiased analysis of alternatives to the proposed project. As stated above, *customers* of the Project Shippers, which would include an entire stakeholder demographic of individuals and businesses, "could seek to use alternative fuel or renewable energy sources". If this is true, then it is fair, reasonable, and necessary to inform *all customers* of the Project Shippers of the intentions of this Project, and to provide them with information regarding alternative options to natural gas, allowing them to make decisions for themselves based on how else they may want to fulfill their personal energy requirements. In this instance, Algonquin, Spectra Energy and the specific utility companies defined as the Project Shippers have unfair and uncontested control over defining the necessity of this project. Although this is a project proposed by a private corporation, the environmental impacts affect the public at large, and public customers of the corporation should be informed of the alternatives available to them, and given the choice whether or not to continue doing business with the Project Shippers, whose demand and corporate incentive seems to be the only factor determining the necessity of this Project. Understandably, it is not the FERC's responsibility to regulate the actual sale of natural gas to consumers, but in order to conclude that *all* possible alternatives to the project were given equal consideration, it is reasonable for FERC to require the Project Shippers to provide adequate, unbiased information to their customers about alternative energy sources. The summation that infrastructure related to renewable energy alternatives to the Project "would result in environmental impacts that could be equal to or greater than those of the Project," is not a statement backed by any substantiated evidence, calculated data or third-party environmental studies. This conclusion should be re-evaluated and the "no action option" should be investigated based on data from existing renewable energy facilities, peer-reviewed research papers on renewable energy source options and market feasibility, and environmental impact assessments conducted by third party firms unrelated to Algonquin, Spectra, or the Project Shippers.

IND248-9 Section 3.2.2, Pg. 3-7: "Further, solar power generation on an industrial/commercial scale requires large, permanent facilities with impervious cover and no shading to allow for the photovoltaic panels to gather energy. In contrast, the permanent right-of way of the proposed Project area would be restored to pre-construction contours and maintained as herbaceous cover. Therefore, a large, industrial/commercial scale, solar power generation facility would result in greater visual, vegetation, and habitat impacts than the proposed Project."

IND248-8

As described in section 1.4 of the EIS, the FERC also conducted considerable outreach and required the same of Algonquin to notify and inform the public about the Project and its potential affects and solicit comments regarding the scope of its analysis. Pursuant to its responsibilities under NEPA, the FERC also evaluated a number of alternatives including the no-action alternative, energy conservation, renewable energy, and other alternatives (see sections 3.1, 3.2, and 3.3 of the EIS). See also the response to comment CO7-5.

IND248-9

Comment noted. The text of the EIS has been revised to acknowledge that it may be possible to construct solar arrays on existing infrastructure such as buildings that would preclude the need for new permanent land impacts.

IND248 – Dana Goodman (cont'd)

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IND248-9
(confd)

C: This statement about Solar energy does not consider the feasibility of utilizing existing infrastructure, such as buildings, abandoned properties, vacant lots and high rise parking garages for mounting solar arrays. It only assumes that solar array projects would necessitate disturbance of established habitat. Leveraging existing developed structures to generate energy from solar arrays could be possible with implementation of Solar Power Purchase Agreements, as defined by the EPA: <http://www.epa.gov/greenpower/buygp/solarpower.htm>, and could provide significant energy output without any disturbance to lands covered by natural habitat. This is not necessarily an option that negates need for the Project, but it does refute the absolute statement that commercial solar power generation would necessarily result in a greater environmental impact than the proposed Project.

IND248-10

Section 4.2.1.5, Pg. 4-20: "Rhode Island was not included in the search, because only one facility (Burrillville Compressor Station) would require work and that activity would take place within Algonquin's existing facility."

C: This disregard for the Burrillville community station is unacceptable. In light of the three quarter periods spent in RCRA non-compliance violations at this facility in 2012, it *remains* important for the Project proprietors to ensure that no toxins are disturbed in or released to the soil profile. Just because the soil is on land owned by Algonquin does NOT mean that contaminated soil doesn't affect the local community. Via stormwaters and other natural channels of distribution through the surface soil and surface geologic features toxins can be transferred from areas of contamination through to the water table and can infiltrate surface waters, aquifers, wells, and other watershed bodies. An analysis of the Burrillville station is necessary to determine that there is no potential for polluted soils to transfer toxins or hazardous substances into ANY local drinking water sources, fishing waters, or swimming waters.

IND248-11

Section 4.3.1.6, Pg. 4-29: "As discussed in section 4.2.1.5, Algonquin conducted a corridor database search using EDR to identify various facilities with potential and/or actual sources of contamination that may impact nearby groundwater along the existing and proposed pipeline and aboveground facilities in New York, Connecticut, and Massachusetts. Rhode Island was not included in the search, because only one facility (Burrillville Compressor Station) would require work and that activity would take place within Algonquin's existing facility."

C: Again, the facility in Burrillville is NOT an island. It is surrounded by homes, farms, and a lake. Contamination at the sight can still affect the local community. Unacceptable exclusion. If it makes sense that this facility be excluded, there needs to be much more detailed information on the reasoning why public health is not at risk. General Comments Summary:

IND248-12

While it is clear that Algonquin and FERC have coordinated with all of the appropriate authorities to ensure legal compliance with federal regulations regarding environmental protection, the corporation lacks proof that the Project is *necessary* for the public good. As artfully described in the language of the document, the misleading statement that the need of the Project Shippers denotes an absolute need for the Project is unfair to public stakeholders who may not even realize the Project affects them because so much

IND248-10

A corridor database search is not necessary in Rhode Island because Algonquin already owns the property on which the existing Burrillville Compressor Station is located, and this is the only location in Rhode Island where work would occur associated with the Project (i.e., a corridor database search would not identify any sites not already known to Algonquin). In order to identify any known contamination at the Burrillville Compressor Station site, we conducted a search of the Rhode Island Department of Environmental Management Office of Waste Management's site inventories, the EPA's Cleanups in My Community database, and the EPA's EnviroFacts database. Based on these sources, no known contaminated soil or groundwater is present at the Burrillville Compressor Station site. Section 4.2.1.5 of the EIS has been revised to reflect this information.

IND248-11

See the response to comment IND248-10.

IND248-12

The purpose and need for the Project is discussed in section 1.1 of the EIS. The focus of the EIS is to evaluate the environmental impacts of the proposal. The Commission will take into account the evaluation in the EIS, along with non-environmental information, to determine whether to issue a Certificate of Public Convenience and Necessity. Significant efforts have been made to notify those affected by the Project. See also the response to comment FA6-5.

IND248 – Dana Goodman (cont'd)

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IND248-12
(cont'd) information about the project is only being shared by a tiny core of directed affected parties. If true public commentary and stakeholder interest were to be accounted for, the "public" notifications of the Project's intention would include *all* of the people in each town where Project operations are proposed, and would include *all* of the customers of the Project Shippers, whose described immediate need for additional natural gas supply is the reason behind the Project Shippers' demand for the Project implementation. Just because information is made publicly available to residents does *not* mean that the information necessarily reaches all potentially interested parties, which is an assurance that Algonquin should guarantee in order for stakeholder commentary to be fair and equal. As a resident of Burrillville, I was only made aware of this project by word of mouth less than three weeks before the commentary period was due to be over. I was never notified of the Project or its impacts directly. I find this unacceptable, and I would suggest that Burrillville residents be given an additional 6 months to prepare commentary statements on the proposed project.

IND248-13 In addition to the restricted disclosure of information, the problem I find with the EIS is a tendency to disregard small impacts, especially those in Rhode Island, and to minimize the severity of potential toxins contamination in water and air. Although many of the impacts recognized by EIS may seem negligible, the problem with this determination is that we are already living in a world where our natural habitat, resources, climate and wildlife have been severely depleted and are under serious threat of deteriorating to levels below sustainability for humans. At this point in our history there is no acceptable level of pollution, deforestation, wetland loss or change, habitat loss or water or air contamination. The more we destroy, construct, pollute and damage our environment, the more we endanger OURSELVES.

IND248-13

The purpose of the EIS is to identify the impacts of the proposed Project. Conclusions that some impacts are less than significant or negligible are justified throughout the EIS.

IND249 – Pramilla Malick

20140930-5020 FERC PDF (Unofficial) 9/29/2014 11:05:28 PM

Submission Description: (doc-less) Motion to Intervene of Pramilla Malick under CP14-96-000.

Submission Date: 9/29/2014 11:05:28 PM

Filed Date: 9/30/2014 8:30:00 AM

Dockets

CP14-96-000 Algonquin Gas Transmission, LLC's Abbreviated Application for a Certificate of Public Convenience and Necessity and for Related Authorizations re its proposed Algonquin Incremental Market (AIM) Project under CP14-96.

Filing Party/Contacts:

Filing Party

Other Contact (Principal)

Individual

Signer (Representative)

Parivas@yahoo.com

Basis for Intervening:

Motion to Intervene CP14-96 Algonquin Incremental Market Expansion Project.

IND249-1

As a resident from Minisink, New York living near the Millennium Pipeline and Gas Compressor Station, I will be impacted by approval of the AIM project. This project will increase gas capacity leaving the Ramo interconnection facility. The Millennium Pipeline feeds into this facility and therefore the increased capacity will create new opportunities for Millennium Pipeline to increase its gas deliveries. Any increase in gas deliveries will impact the safety and integrity of Millennium's existing facilities in Minisink. This will also further adversely impact the quality of life which has greatly deteriorated since the construction and operation of the Minisink Compressor Station.

As a landowner that will be impacted by this project or has the potential to be impacted, I reserve all my rights, and herein submit this motion to intervene.

Thank You

Pramilla Malick
264 Jacobs Road
Westtown NY 10988

IND249-1 The Project does not include any modifications to facilities or operational capacity through the Millennium Pipeline or Minisink Compressor Station.

IND250 – Pramilla Malick

20140930-5019 FERC PDF (Unofficial) 9/29/2014 11:58:44 PM

Pamilla Malik, Westtown, NY.
Consultation with DOT and NRC Regarding Risk Assessment for AIM Project

Honorable Secretary Kimberly Bose
Federal Energy Regulatory Commission

IND250-1 The AIM Project proposes the construction of a new 42 inch high pressure pipe that would be sited in areas that pose an extremely high safety risk. The greatest risk would be from its close proximity to Indian Point Nuclear Plant. A catastrophic event at this location would impact not only residents within the potential impact radius, but well beyond that radius if the nuclear plant were to be concurrently impacted. There is also a significant concentration of electrical transmission lines that follow the route of the proposed pipeline. This combination of high-risk infrastructure warrants consultations with PHMSA as well as the Nuclear Regulatory Commission

IND250-2 According to a 1993 Memorandum of Understanding between DOT and FERC Regarding Natural Gas Transportation facilities the Commission shall refer to the DOT when safety concerns are raised by governmental bodies or members of the public. The memo states:

2. The Commission shall:

A. Promptly alert the Department when the Commission becomes aware of an existing or potential safety problem involving natural gas transmission facilities.....

...d. Establish a means to notify the Department when significant safety issues have been raised during the preparation of environmental assessments or environmental impact statements.

e. Refer to the Department, after screening, complaints and inquiries made by state and local governments and the general public involving safety matters related to pipelines under the Commissions jurisdiction.

I herein requests formal consultations with DOT by FERC on all issues related to the safety posed by approval of this project, including a risk assessment of placing a high pressure gas pipeline in close proximity to Indian Point, along with electric transmission lines, over an existing fault line. I request that the consultations be transparent and made available to the public, along with any resulting recommendations.

Thank You
Pramilla Malick

IND250-1 See the responses to comments FA4-25 and SA7-4. We also note that PHMSA is a cooperating agency in preparing this EIS.

IND250-2 See the responses to comments FA4-25, SA4-2, and SA7-4. PHMSA is a cooperating agency in preparing this EIS and attended the scoping meetings and the draft EIS public comment meeting in New York.

IND251 – Jan Very Creamer

20140930-5014 FERC PDF (Unofficial) 9/29/2014 10:28:53 PM

IND251-1 Jan Very Creamer, Wakefield, RI.
As a member of Fossil Free Rhode Island, I agree wholeheartedly with the comments Lisa Petrie has compiled about the deleterious health effects and poisoning of the air, land, and water from the fracked gas that will be carried by our Algonquin Pipeline both here in Rhode Island, at our compressor station in Burrillville, Rhode Island, and all along this pipeline! Besides the poisoning of our air, water, and land eventually everywhere with its deadly effects on humans and our ecosystems and thereby, the increase of global warming by this supposed "bridge fuel" actually worst of all fossil fuels due to its methane, we have an added moral obligation not to be part of a system that has slickly convinced landowners to innocently sign nondisclosure agreements that stop them from speaking to anyone or seeking legal help when their land, air, and water is poisoned and their lives ruined! Landowners are also helpless to their land being taken by eminent domain under the auspices of the Natural Gas Act of 1938. These "landgrabs" by the fracking industry are happening more and more and yet another reason why alternative sources of energy should be sought! I obviously oppose any expansion of this Algonquin Pipeline and would like to see it shut down entirely and the billion dollars spent on alternative sources of energy!!

IND251-2

IND251-1 See the responses to comments FA4-23, SA4-4, SA4-9, SA4-10, and CO7-3.

IND251-2 Comment noted. Eminent domain is discussed in section 4.8.2 of the EIS. See also the responses to comments FL2-2 and CO7-5.

IND252 – Jessica Porter

20140930-5015 FERC PDF (Unofficial) 9/29/2014 10:32:58 PM	
IND252-1	<p>Jessica Porter, Dedham, MA.</p> <p>I am adamantly opposed to the Algonquin pipeline project for a number of reasons:</p> <p>Quality of life: I live directly on the proposed Algonquin pipeline route in Dedham, MA - the pipeline would be placed within 30 feet of my home putting me within the radius of impact. The construction of the project would impact the immediate quality of life in my neighborhood and town for at least a year and a half.</p>
IND252-2	<p>Safety and poorly designed route: the route for the pipeline is illogical - in our town it would travel through residential neighborhoods and underneath a busy highway rather than taking a much more direct route that would avoid densely populated areas and roadways frequented by heavy trucks. The endpoint of the pipeline is across from a quarry that does active blasting. I believe Algonquin chose the route in order to maximize their profits without concern for public safety or quality of life.</p>
IND252-3	<p>Inadequate process: Algonquin claims to have held public meetings but did not let abutters know about the project until long after the initial set of required public meetings. The FERC meeting held in our town was also inadequately advertised, and offered no opportunity to learn more about the proposal. If you are to seriously consider building/expanding this pipeline, there should be a thorough and genuine dialogue about pros and cons which brings all stakeholders together - FERC, Algonquin, town officials, residents, and business owners. The lack of dialogue and opportunity for discussion in the process so far has eroded the credibility of both FERC and Algonquin.</p>
IND252-4	<p>Dependence on fossil fuels: As I'm sure you know, natural gas production in the US has increased by 35 % in less than 10 years. (Source: http://fivethirtyeight.com/features/the-natural-gas-boom-could-accelerate-climate-change/#fn-1) It is very likely that the methane leakage resulting from fracking is accelerating climate change at a dangerous rate. It is simply irresponsible for the US government to approve any projects which increase production and consumption of fossil fuels. Ironically, the route the pipeline would take through our town is adjacent to a series of big box stores which could all house solar panels. FERC needs to take a stand now that rather than enabling our dependence on fossil fuels, the government will support and reward companies that invest in clean energy and technology.</p> <p>I urge you to take a stand for our country and our future and deny the application of Algonquin/Spectra to expand their pipeline.</p> <p>Sincerely, Jessica Porter</p>

- IND252-1 Algonquin has submitted, and we have reviewed, revised site-specific construction plans for all residences within 50 feet of the construction work area, to reduce the disruptions and inconveniences associated with pipeline construction near residences. See also the response to comment SA4-5.
- IND252-2 See the responses to comments FA6-1, LA27-1, IND54-9, and IND236-5.
- IND252-3 Significant efforts have been made to notify those affected by the Project. See also the response to comment FA6-5 and section 1.4 of the EIS for the numerous outreach efforts and the notification of stakeholders.
- IND252-4 See the responses to comments F4-24, CO7-3, CO7-5, and FL2-2.

IND253 – Laurie Evans

20140930-5013 FERC PDF (Unofficial) 9/29/2014 10:18:39 PM	
IND253-1	Laurie B. Evans, Katonah, NY. FERC's DEIS omits a comprehensive, transparent and independent EIS for water, soil and air testing, as well as proximity to two high voltage power lines intersecting with Indian Point. FERC should not issue building permits until the following concerns and testing for health and safety be completed.
IND253-2	Taxpayers bear the costs of additional emergency response actions, healthcare, damage to water supplies and other impacts.
IND253-3	Proposed expansion significantly exceeds the volume of natural gas committed for purchase by local distributors. Taxpayers should not bear steep costs of public health, environmental and economic impacts of natural gas infrastructure for the purpose of facilitating natural gas export.
IND253-4	I feel concerned that the current emissions will be significantly increased by the expansion of the Southeast and Stony Point compressor stations, and other gas pipeline infrastructure and operations (including but not limited to metering and regulating stations, pipelines, valves, fittings and pigging operations. The tri-state region including Rockland, Westchester, and Putnam counties is already considered a non-attainment zone for air quality standards according to the U.S. Environmental Protection Agency and exceeds the limits for pollutants such as ground level ozone and particulate matter; and;
IND253-5	The location of the AIM pipeline within close proximity to the Indian Point Nuclear Facility and 40 years of spent fuel rods, intersecting with two proposed high voltage power lines, and in close proximity to a significant seismic zone, poses a risk of catastrophic damage with profound long-term health, environmental and financial impacts on the region; and I have significant concerns that have been raised about the Algonquin Pipeline Expansion Project's impacts on the environment, due to the possibility of leaks, explosions and daily expulsions of gases from the compressors;
IND253-6	The design and construction of this pipeline would cause additional release of toxic chemicals into the air thus adding to the existing poor air quality which already exceed EPA standards; Peer-reviewed scientific studies indicate that emissions from compressor stations and other shale gas infrastructure are associated with negative health impacts; and Peer-reviewed scientific studies and the World Health Organization link exposure between air pollution and neurological, cardiovascular, respiratory and other health impacts; and

IND253-1 See the responses to comments FA4-1, FA4-25, and SA7-4.

IND253-2 Information regarding emergency response is provided in section 4.12.1 of the EIS. See also the responses to comments LA1-4 and LA1-9.

IND253-3 See the responses to comments FL4-4, CO15-4, and IND102-3.

IND253-4 See the responses to comments SA4-1 and SA4-9.

IND253-5 See the responses to comments FA4-25, SA4-2, and SA7-4.

IND253-6 See the responses to comments SA4-1, SA4-9, and SA4-10.

IND253 – Laurie Evans (cont'd)

20140930-5013 FERC PDF (Unofficial) 9/29/2014 10:18:39 PM	
IND253-7	Materials and contaminants in the gas pipeline include Radium precipitate, Radon and its decay products, Lead and Polonium, many of which are known carcinogens; and
IND253-8	There is presently no advanced notification for all planned compressor station and other gas pipeline infrastructure and operations blowdowns, either full or partial, or immediately following any unplanned partial or full blowdowns in order for residents and public officials to take prompt emergency measures; and
IND253-9	I require such potential adverse environmental impacts would typically be evaluated through an Environmental Impact Statement (EIS) according to the State Environmental Quality Review (SEQR) Act and appropriate alternatives and mitigation strategies examined;
IND253-10	I require advanced notification of all planned blowdowns, either full or partial, and notification within 30 minutes following any unplanned partial or full blowdowns of the Stony Point and Southeast compressor stations and other gas pipeline infrastructure and operations (including but not limited to metering and regulating stations, pipelines, valves, fittings, and pigging operations) be given to the Town of Lewisboro and also to the County of Westchester in order to alert all residents, police, fire departments and municipalities within Westchester County;
IND253-11	I require that a comprehensive and transparent Health Impact Assessment (HIA), as outlined by the Centers for Disease Control and the National Academy of Sciences, be conducted by an independent entity acceptable to industry, local government officials, advocates and the public, and funded by Spectra Energy;
IND253-12	that a comprehensive, independent and transparent risk assessment of the potential catastrophic explosion of a 42" diameter high-pressure pipeline in close proximity to Indian Point Nuclear Facility and a significant seismic zone be conducted, and that assessment should be funded by Spectra Energy, to be completed in accordance with CFR Federal Law 50.59 and 10 CFR 100.20 regarding changes to site.
IND253-13	I oppose placing the pipeline near wetlands.
IND253-14	This project should be assessed on a cumulative basis, of both environmental and health impacts, not a segmented piece meal way with new projects being added.
IND253-15	I oppose any construction of maintenance facilities located near schools, parks, houses of worship, business or residential districts or any other population centers and any current existing facilities near such locations be moved along the right-of-way.
IND253-16	Once the water is polluted and people are ill, we cannot undo the damage. I urge you to prevent the harm.

IND253-7 See the response to comment SA4-4.

IND253-8 See the response to comment SA4-3.

IND253-9 See the response to comment SA4-15.

IND253-10 See the response to comment SA4-3.

IND253-11 See the response to comment SA4-10.

IND253-12 See the responses to comments FA4-25 and SA4-2.

IND253-13 Comment noted.

IND253-14 See the response to comment FA3-5.

IND253-15 See the response to comment SA4-5.

IND253-16 Comment noted.

IND254 – Judith Stein

20140930-5016 FERC PDF (Unofficial) 9/29/2014 11:26:34 PM

IND254-1 Judith Stein Coleman, Croton on Hudson, NY.
The existing pipeline was laid before the Indian Point power plants were built and before the existence of the two fault lines was discovered. In light of this, it seems inconceivable that a larger, expanded gas pipeline should be built at this location.

IND254-1

See the responses to comments FA4-25 and SA4-2.

IND255 – Marion Walsh

20140930-5018 FERC PDF (Unofficial) 9/29/2014 11:57:13 PM

Marion Walsh, Esq., Cortlandt Manor, NY.
Ms. Kimberly D. Rose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Dear Ms. Rose:

IND255-1

As a parent and Board of Education trustee residing within the boundaries of the Hendrick Hudson Central School District, I am deeply concerned about the proposed AIM project and the expansion of the existing gas pipeline. I oppose such project and believe that this expansion poses an unreasonable risk to children in the community. Moreover, such expansion is unsafe in such a densely populated area, so close to the Indian Point Nuclear Facility.

Specifically, the EIS does not adequately address the impact on the schools and children of the Hendrick Hudson community or address the impact of the proximity to Indian Point and the compounded risks both projects pose to community residents.

As to the school proximity, the draft EIS only contains a superficial and inadequate analysis of the impact of the AIM project on the Buchanan Verplanck Elementary School and notes temporary disruption of school activities. The EIS does not analyze potential health impacts on the children or analyze the potential risk of an adverse event, once the pipeline is operating. The expansion is much too close to the elementary school and poses a hazard to the children. These children already live in the shadow of a nuclear facility and the compounded risk of the pipeline is unacceptable. I also note that this area of the county has a significantly higher poverty rate than most of Westchester County and a significant number of children attending the Buchanan Verplanck Elementary School live below or at the poverty level and already are at risk, for educational or health challenges. FERC must consider an alternative route for this project, so that no schools fall within the zone to be impacted by an adverse event. I note that, upon information and belief, the detailed impact statement of the project on the EV school was not available at this time, although promised by the end of the comment period. If this is true, it represents a callous disregard of the welfare of this community.

IND255-2

The EIS, surprisingly, does not contain any detailed analysis of the impact of the construction or any compounded risk due to the proximity to an aging nuclear facility Indian Point. The compounded risk is unreasonable and the EIS must be deemed inadequate. FERC should order an alternative route away from a nuclear facility.

In short, the EIS does not adequately or appropriately address the safety impacts to the public in our community.

Very truly yours,

IND255-1

Section 4.12.1 of the EIS discusses federal safety standards for natural gas pipelines and how these standards are applied in HCAs. Section 4.12.3 of the EIS discusses safety-related concerns and other specific measures that Algonquin has proposed or that we are recommending to further address public safety concerns. See also the responses to comments FA4-25, SA1-9, and SA7-4.

IND255-2

Construction impacts are extensively discussed throughout the EIS. See also the response to comment FA4-25.

IND255 – Marion Walsh (cont'd)

20140930-5018 FERC PDF (Unofficial) 9/29/2014 11:57:13 PM

Marion Walsh

IND256 – Erica Mills

20140930-5012 FERC PDF (Unofficial) 9/29/2014 9:58:43 PM	
IND256-1	<p>Erica Mills, Buchanan, NY. The Draft EIS in its current format is questionable on many levels. Spectra/Algonquin has not provided enough information to ensure the safety of our community and guarantee there will be no risk to the area.</p> <p>Here is a short list of how the pipeline would/could negatively impact Westchester County:</p> <ul style="list-style-type: none"> • The possibility of a natural disaster such as an earthquake • human error in building the pipeline and future maintenance • the proximity to Indian Point Nuclear Power Plant (there is no place else on the planet with a High Pressure pipeline this close to a Nuclear Power Plant) • the proximity to 5V Elementary School and Buchanan parks • the proximity to homes and businesses • the proximity to train lines which transport oil, people and other cargo
IND256-2	<ul style="list-style-type: none"> • the proximity and potential loss of wildlife, tress, park land and the impact to the area as a result
IND256-3	<ul style="list-style-type: none"> • the potential for a catastrophic disaster in this densely populated area (terrorist attack or natural disaster)
IND256-4	<ul style="list-style-type: none"> • fire and police do not have the necessary equipment and manpower in case of an accident or incident
IND256-5	<ul style="list-style-type: none"> • the proximity to St Patrick's Church in Verplanck
IND256-6	<p>I am also concerned about the levels of radon and other information cited at the Cortlandt, NY meeting about blow downs and Pig stations. These do not seem to be regulated in a safe way for the people living in close proximity to them.</p>
IND256-7	<p>This list could go on and on. At the FERC meeting in Cortlandt, NY on 9/15/14 I sat and listened to countless men and women and elected officials question how this project could be approved with the Draft EIS as is. I beg you FERC, please do not approve this until all questions are answered fully. We deserve answers and risk assessment before this pipeline proceeds.</p> <p>I can't imagine the impact this would have on this area. It will be devastating to us and our children. We deserve clean air, clean water, and a safe environment to raise our children. Adding this pipeline to an already overloaded area makes no sense. THIS IS COMMON SENSE. Do not allow this here.</p>

IND256-1	See the responses to comments FA4-25, SA4-2, and SA7-4. While the possibility of human error exists in most human undertakings, we do not agree that human error in itself represents an impact; we believe human error is accounted for in the development of pipeline safety regulations and practices to incorporate conservative margins of safety. Natural gas transmission lines and railroads cross one another throughout the country, and the crossings are designed to ensure mutual compatibility and safety. We do not consider pipeline crossings of railroads to have an impact on public safety.
IND256-2	Comment noted. As explained in section 4.7.2 of the EIS, Algonquin has planned the Project to minimize tree clearing, impacts on migratory birds and wildlife, and other sensitive resources by using their existing rights-of-way to the maximum extent possible.
IND256-3	See the response to comment CO7-6.
IND256-4	See the responses to comments LA1-4, LA1-9, and LA8-2.
IND256-5	See the responses to comments SA1-8 and SA4-5.
IND256-6	See the response to comment SA4-4.
IND256-7	Comment noted. See also the response to comment FA4-1.

IND257 – Kevin O’Neill

20140930-5011 FERC PDF (Unofficial) 9/29/2014 9:53:15 PM

IND257-1

Kevin O'Neill, Scarsdale, NY.

1. I SUBMIT MY COMMENTS UNDER PROTEST. I BELIEVE THE PROCESS BY WHICH FERC REVIEWS PROPOSALS SUCH AS THOSE REFERENCED IN DOCKET CP14-96 IS INADEQUATE TO THE TASK AND NOT LEGAL.

2. I believe the use of the word "Algonquin" in the naming of this dangerous fracking gas infrastructure project proposed by Spectra Energy to be an insult to First Nations people. Accordingly, I consider such use of the word to be an abomination and I hereby request that all work on CP14-96 be suspended until the word Algonquin is removed from all submitted materials.

3. I further request that the name of project described in CP14-96 be changed to: "Fracking Monstrosity Pipeline".

4. I further request that the name of project described in CP14-96 be changed to: "Westchester's Fracking Monstrosity Pipeline" in all official communication relating to any portion of the project situated in or in any manner affecting persons or property or air, water or land in Westchester County, NY. I request that other affected counties in NY, CT and elsewhere have their County names used in like manner as appropriate.

With the above in mind and with grateful appreciation to the two authors listed below I hereby submit the following SCNG LYRICS as my final comment on this matter on this day, September 28, 2014, the last day comments are being accepted in this bad bad process by which certain people are considering a bad bad project:

The Rubber Stamp Machine (Yellow Submarine)

We're here at FERC to have our say
So listen closely, don't walk away
This is your country It's yours to save
You're letting fossil fuels dig our grave

Across the land from sea to sea
The gas-men drill the earth so carelessly
They poison water, they cut down trees
To put in pipelines that we don't need

And we all know that FERC's a rubber stamp machine,
It's not for you and me, it's paid by permit fees
We all know that FERC's a rubber stamp machine,
It won't protect you, it won't protect me

You guys at FERC, so you say
Will regulate the pipes, and keep us safe
Tell me then how industry
Puts dangerous pipelines in NYC

Our upstate friends are feeling down

IND257-1

Comment noted.

IND257 – Kevin O’Neill (cont’d)

20140930-5011 FERC PDF (Unofficial) 9/29/2014 9:53:15 PM

IND257-1
(cont'd) The Constitution Pipeline, will wreck their towns
With leaky pipes and clear cut trees
Fracked wells and poisoned springs

We all know that FERC's a rubber stamp machine,
a rubber stamp machine, a rubber stamp machine
We all know your hearings are a total joke,
FERC is just a fraud, it's all a bunch of smoke

Voices:

Full speed ahead, Mr. FERC Inspector! Full speed ahead!
Full speed it is Mr. Gasman!
Cut the trees down! Carve up the landscape!
Spread that toxic waste on the roads!
Aye aye, Sir! Aye aye!

And we fight cause we believe
No one should be forced to ever breathe
Skies of ozone (Skies of ozone) and benzene (and toluene)
In our ferky (our ferky jerky) democracy (bureaucracy, ha-ha!)

We all know that gas is anything but green
It poisons all our wells, or blows to smithereens
And we all know that FERC's a rubber stamp machine,
It won't protect you, it won't protect me

We all know that FERC's a rubber stamp machine,
a rubber stamp machine, a rubber stamp machine
We all know that FERC's a rubber stamp machine,
It won't protect you, it won't protect me.

LYRICS by Dave Publow and Monica Hunka; Originally performed by Occupy
the Pipeline and the People's Puppets

##

@kgo81

IND258 – Kelly Wall

20140930-5010 FERC PDF (Unofficial) 9/29/2014 9:52:35 PM

IND258-1 Kelly Wall, Buchanan, NY.
It is unacceptable to allow expansion of the existing gas pipeline in a high-density residential area within 500 feet of an elementary school, on fault lines and in proximity to an existing nuclear power plant with its stored spent fuel rods. The government's first obligation should be to the safety of its citizens and this proposed project clearly jeopardizes the safety of this community.

IND258-2 This is not a case of not-in-my-backyard. This community is already home to the Indian Point Nuclear power plant and does not wish to shoulder the burden of another region's energy needs as this pipeline will transport gas from outside the state through to other states, disrupting our homes, health & safety in the process. We should not be expected to be the crossroads of the Northeast's energy needs nor the facilitator of profits for Spectra Energy.

I urge you to reject the proposed pipeline expansion.

IND258-1 See the responses to comments FA4-25, SA4-5, SA7-4, and SA1-9.

IND258-2 Comment noted.

IND259 – Patricia Guarino

20140930-5009 FERC PDF (Unofficial) 9/29/2014 9:44:22 PM

IND259-1 Patricia Guarino, Cortlandt Manor, NY.
As a resident of Cortlandt that will have the pipeline installed close to my residence, my work place and where my family lives in Connecticut, I am not against this project because of its proximity. I am against the pipe line because Spectra is not having conversations with the town it plans to run through. I would normally invite industry, energy projects and progress to my town. But the only information available is from Facebook or the local "against" people who are using social media to reach out in the community.
I find Spectra to be not forthcoming with the information regarding the pipeline beyond the EIS submitted. I find the intimidation used at the town meetings of union representatives with t-shirt slogans and rudeness while others were speaking, to be appalling. I'm appalled that this is how Spectra allows their project to be represented. I found that some of the union people wearing united shirts were not union people at all, but illegal immigrants who stand regularly at the corners in Peekskill waiting for jobs. I find that the people speaking "for" the project at the town meetings were not Spectra representatives informing the public, but rather uneducated puppets reading prepared statements that talked about jobs and not the issues of safety, maintenance, installation processes, omissions, emergency procedures and anything that informs Cortlandt or any other town of what we are in store for. I found it disturbing that my questions to a few individuals were met with a very tough attitude. None of the six persons I tried to speak with could tell me what street they live on in our town, where their significant other worked, or the school their children attended. One did say to me "Cortlandt High School," of which none such school exists to my knowledge. I found it particularly disturbing people speaking "for" the project were incorrect in their facts, among those that this is a transmission pipeline, not a distribution pipeline and this is not replacing a pipeline already existing in Cortlandt Manor. I find it appalling to hear the billions of dollars Spectra has invested in this project but has not invested in presenting itself as a modern energy company with a progressive project it wants to bring to our town. I find it appalling that residents have to ask questions regarding safety, insurance, installation procedures, and they are not forthcoming. It's the lack of conversation and representation that strikes fear in my heart, equating the experience much like a teenager wanting to borrow my car but when he is unclear on where he's going with it I'm hesitant to hand over the keys. I am hesitant to let Spectra drive this project. In my search to find reasons to approve the project, I find more reasons to question the project.

In personal relationships, when delivering news that might not be well received, the best approach is to be forthcoming and honest, but I am under the impression Spectra does not have any intention of improving its relationship with the people or towns its project will impact. They stop short by supplying only what is required by law and will not extend themselves by any means.
I know the pipeline has to go somewhere.

IND259-1

Comment noted.

IND259 – Patricia Guarino (cont'd)

20140930-5009 FERC PDF (Unofficial) 9/29/2014 9:44:22 PM

IND259-2 I do hope that if FERC approving or disapproving the environmental impact statement is the only means of stopping this project then I propose we get more information regarding the pipeline emergency procedures on and near Indian Point. There have been many gas pipe explosions this year in the US, and I am concerned that there are no protocol or emergency procedures in place. The devastation in these accidents was caused by pipes and PSI numbers were smaller than the one in this project, yet the EIS does not reflect this. With that in mind, it worries me that a pipeline problem at Indian Point will result in catastrophic consequences. People are needed to operate Indian Point, and if a pipeline jeopardizes their safety, it jeopardizes the safety of everyone in the tri-state area. For example, a 30 inch pipeline in New Mexico exploded August 12, 2014. The crater was 86 feet long and 46 feet wide and 20 feet deep. The fire lasted 30 minutes or more, and was visible 20 miles away. The ruptured line threw flames 200 yards away. My concern is that we have a much larger line going in, so if a similar situation arises, the impact will be much more than covered in the EIS. And if this situation occurs near Indian Point, well a couple million people will have one very bad day that will make 9/11 look like a cakewalk.

IND259-3 One last point about the EIS that worries me most of all, is one that does not end at our town line. The EIS is limited to the impact for where the pipeline is going to rest in our community. The EIS does not take into consideration the negative impacts caused by using natural gas and all the means it takes to access the gas and send it for export. As an American, I have no problems with the pipeline going in my town. (I am actually trying to find reasons to warm up to the idea, but instead find Spectra to be a poor resource.) But I do have issue with the fact that countries overseas achieved energy independence and these countries have far less economic success than the US and I hope that FERC takes into account its own agenda, to keep a clean, healthy environment and not approve the project just because Spectra has billions of dollars invested into it, but more so the fact the US is pitifully behind when it comes to protecting the environment. I hope FERC takes into account the health of our planet, not just on this project, but on all combined projects it is being asked to approve. No company wants to hear its project won't go through. But everyone wants to be the best when their finest hour comes. This is FERC's chance to rise to the occasion and do what is best for the environment, the climate, the future of our planet.

IND259-4

Thank you for considering my opinion.

IND259-2

See the response to comment FA4-25. With respect to the comment that there are no protocol or emergency procedures in place, Algonquin's emergency response plans, required by federal rules, are discussed in section 4.12.1 of the EIS. Such plans have been in place for the existing system, and would be updated to account for the AIM Project facilities.

IND259-3

See the responses to comments CO15-4 and IND4-1.

IND259-4

Comment noted.

IND260 – Abraham Tejada

20140930-5106 FERC PDF (Unofficial) 9/30/2014 10:29:09 AM

IND260-1 | Abraham Tejada, New Rochelle, NY.
I live locally and it will help bring jobs to the area. Our union will provide highly skilled and trained workers for this project. The residents of the area can depend on us to get the job done safely.
I support the AIM project

IND260-1

Comment noted.

IND261 – Brice McMasters

20140930-5105 FERC PDF (Unofficial) 9/30/2014 10:27:19 AM

IND261-1 | Brice McMasters, Cold Spring, NY.
The Algonquin project will help provide a much needed boost to our domestic energy needs for the future. I support this project and feel it is good for our area.

IND261-1

Comment noted.

IND262 – Adoindo Moura

20140930-5102 FERC PDF (Unofficial) 9/30/2014 10:25:58 AM

IND262-1 | Adoindo Moura, Mahopac, NY.
This project is a great idea for the local economy and we need projects like this to help our towns and villages.
I support the AIM project

IND262-1

Comment noted.

IND263 – Vasco Meireles

20140930-5099 FERC PDF (Unofficial) 9/30/2014 10:21:41 AM

IND263-1 | Vasco Meireles, Yonkers, NY.
I live in Westchester County, New York and I fully support the pipeline expansion as it would create new jobs and provide domestic energy for our area.
I live here and I support the AIM project.

IND263-1 Comment noted.

IND264 – Michael Moreira

20140930-5098 FERC PDF (Unofficial) 9/30/2014 10:20:11 AM

IND264-1 | Michael Moreira, Putnam Valley, NY.
I live locally and feel the AIM project would bring good paying jobs to our area. As a member of Laborers' Local 60, I know that this project will be built by a highly skilled and trained workforce.
I support the SIM project.

IND264-1 Comment noted.

IND265 – Michael Gronowski

20140930-5072 FERC PDF (Unofficial) 9/30/2014 9:14:55 AM

IND265-1 | Michael Gronowski, Stormville, NY.
I think this would be a plus for the economy with union jobs and help with energy demands.

IND265-1 Comment noted.

IND266 – Luis Sumbe

20140930-5149 FERC PDF (Unofficial) 9/30/2014 11:48:58 AM

IND266-1 | Luis Sumbe, Ossining, NY.
Good paying jobs and done with a highly skilled work force. This will also help generate a lot of good paying jobs for people in the community and also help with generating a tax base also. Thank you.

IND266-1 Comment noted.

IND267 – Angel Quintauna

20140930-5143 FERC PDF (Unofficial) 9/30/2014 11:39:31 AM

IND267-1 | Angel Quintauna, Ossining, NY.
Work to be done with a highly skilled and trained workforce. We really need these jobs for our community. Please help us to get these important jobs for our safety and future.

IND267-1 Comment noted.

IND268 – Rafael Gonzolaez

20140930-5139 FERC PDF (Unofficial) 9/30/2014 11:31:41 AM

IND268-1 | Rafael Gonzolaez, New Rochelle, NY.
Work to be done with highly skilled and trained work force. These jobs will also help to improve the quality of living for many construction workers. Please help us get this work.

IND268-1 Comment noted.

IND269 – Pedro Santiago

20140930-5138 FERC PDF (Unofficial) 9/30/2014 11:25:00 AM

IND269-1 | Pedro Santiago, Peekskill, NY.
This is good for all Union workers and the public. Thank you very much!

IND269-1 Comment noted.

IND270 – John Sullivan

20140930-5134 FERC PDF (Unofficial) 9/30/2014 11:11:40 AM

IND270-1 | John Sullivan, Cornwall, NY.
The Algonquin pipeline will provide good paying Union jobs so in turn we can provide for our families in this hard economy. Good paying jobs for the community which will spend the money in their communities which in the long run will benefit everyone.

IND270-1 Comment noted.

IND271 – Jeffery Black

20140930-5136 FERC PDF (Unofficial) 9/30/2014 11:20:38 AM

IND271-1 | Jeffery Black, Hyde Park, NY.
We really need more jobs in our area. Lower unemployment statistics. Please help us get these well needed jobs. Thank you!

IND271-1 Comment noted.

IND272 – David Miller

20140930-5135 FERC PDF (Unofficial) 9/30/2014 11:17:25 AM

IND272-1 | David Miller, Yonkers, NY.
I am in favor of the Algonquin pipeline expansion. This project would provide jobs for our skilled workers and the expansion would greatly improve the supply of natural gas for energy! Please allow us to do this much needed project for the safety of our communities and jobs for our families. Thank you all for your concerns.

IND272-1 Comment noted.

IND273 – Roy Emlet

20140930-5127 FERC PDF (Unofficial) 9/30/2014 11:01:06 AM

IND273-1 | Roy Emlet, Yonkers, NY.
This job will be great for the economy and for work. The new pipeline will also be good for the environment and safety also. We need a new line.

IND273-1 Comment noted.

IND274 – Louis Camardella

20140930-5132 FERC PDF (Unofficial) 9/30/2014 11:06:35 AM

IND274-1 | Louis Camardella, Harrison, NY.
I live locally and could really use the employment opportunities from this work. Work has been slow and scarce the last couple of years. We really need to make this old line safer. Thank you all for your concerns.

IND274-1 Comment noted.

IND275 – Jose Costa

20140930-5109 FERC PDF (Unofficial) 9/30/2014 10:35:58 AM

IND275-1 | Jose Costa, Pelham, NY.
This project will provide great paying jobs to our community. It will also provide a great boost to our local economy and generate tax revenues that will help our local infrastructure and schools.

IND275-1 Comment noted.

IND276 – Carlos Sasaguay

20140930-5107 FERC PDF (Unofficial) 9/30/2014 10:31:56 AM

IND276-1 | Carlos Sasaguay, Sleepy Hollow, NY.
The Algonquin project promises to bring good paying jobs to our area and will be performed by a trained workforce. I support the AIM pipeline

IND276-1 Comment noted.

IND277 – Jaime Gonzalez

20140930-5108 FERC PDF (Unofficial) 9/30/2014 10:33:18 AM

IND277-1 | Jaime Gonzalez Ceja, New Rochelle, NY.
I live locally and I support this project as it is going to create new job opportunities to our members

IND277-1 Comment noted.

IND278 – Vincent Beverly

20140930-5100 FERC PDF (Unofficial) 9/30/2014 10:22:58 AM

IND278-1 | Vincent Beverly, Bronx, NY.
I live locally and I am in need of a good paying job. Our area needs
these type of jobs to improve our community and to help our area grow.

IND278-1 Comment noted.

IND279 – Antonio Martins

20140930-5101 FERC PDF (Unofficial) 9/30/2014 10:24:15 AM

IND279-1 | Antonio Martins, West Harrison, NY.
I live in Westchester and feel this project will help our local economy
and provide work to the resident of this area.
I support the Algonquin project!

IND279-1 Comment noted.

IND280 – Carlos Gweria

20140930-5223 FERC PDF (Unofficial) 9/30/2014 1:41:12 PM

IND280-1 | Carlos A. Gweria, Fishkill, NY.
Work to be done by highly skilled workers from local Union halls in
the area. We really need this work for as of us to prosper. Thank you!

IND280-1 Comment noted.

IND281 – Carlos Remedios

20140930-5228 FERC PDF (Unofficial) 9/30/2014 1:45:16 PM

IND281-1 | Carlos Remedios, Garnerville, NY.
I think its a great idea for many reasons especially for job opportunities here in our local and others. We really need this for our families.!

IND281-1 Comment noted.

IND282 – Luis Fernandes

20140930-5229 FERC PDF (Unofficial) 9/30/2014 1:49:43 PM

IND282-1 | Luis Fernandes, Yonkers, NY.
Safe and great project for Westchester county. We really need this work to improve the existing line and also to provide our families with well needed jobs in the area so that we can put the money back in the economy.

IND282-1 Comment noted.

IND283 – Joao Dos Reis

20140930-5231 FERC PDF (Unofficial) 9/30/2014 1:54:30 PM

IND283-1 | Joao Dos Reis, Yonkers, NY.
I believe this project will mean jobs for our members. It will also generate much needed tax revenue for our communities. We really need this work for our families right now. Things are very tough on the working middle class right now. Especially for those who are single working parents. Please help us to get this work any way that is possible. Thank you.

IND283-1 Comment noted.

IND284 – Jose Ramirez

20140930-5235 FERC PDF (Unofficial) 9/30/2014 1:59:44 PM

IND284-1 | Jose Ramirez, New Rochelle, NY.
The work on this job is highly needed and will be done with professional, trained, drug free workers that will be putting their paychecks back into the communities in which they come from. Thank you.

IND284-1 Comment noted.

IND285 – Rigoberto Franco

20140930-5240 FERC PDF (Unofficial) 9/30/2014 2:05:59 PM

IND285-1 | Rigoberto Franco, New Rochelle, NY.
I live locally and believe this will provide our community with good paying jobs. It will also help us with our domestic energy demands and have minimal environmental impact on our planet. The Unions will also be able to provide the company with highly trained workforce which through there paychecks will be able to spend the money they make by putting it back into their communities. It will create a lot of tax revenues also.

IND285-1 Comment noted.

IND286 – George Moreland

20140930-5244 FERC PDF (Unofficial) 9/30/2014 2:28:26 PM

IND286-1 | George Moreland, Eufaula, AL.
I George Moreland I am in agreement of the potential pipeline project. Good paying jobs for Americans and for union workers are always a good thing. I am always willing to help with any job.

IND286-1 Comment noted.

IND287 – Juan Diaz

20140930-5248 FERC PDF (Unofficial) 9/30/2014 2:35:48 PM

IND287-1 | Juan C Diaz, Portchester, NY.
It is a great idea to change to old pipeline and upgrade to newer lines for many safety factors. There are many possible incidents that could arise do to some of the older lines out there. This project will also create many new jobs for us and our co workers. We are all lower middle class but it is tough living paycheck to paycheck every week. The stress level of running a job is crazy and wondering where your next check is coming from and when. Please help us well trained workers get this job and give us the opportunity to show you guys what we can really do when the pressure is on!!

IND287-1 Comment noted.

IND288 – Jose Alves

20140930-5254 FERC PDF (Unofficial) 9/30/2014 2:41:33 PM

IND288-1 | Jose Alves, Garrison, NY.
I live locally and really need a good steady Union paying job to support me and my three children. We need these jobs also to protect our community from a lot of these low paying contractors that are trying to come into our areas and make us work for a wage that is near impossible just to pay rent on a place. We need to provide for our families #1. Put these jobs and our workers out and lets generate some money for the economy!

IND288-1 Comment noted.

IND289 – Vincent Curtes Jr.

20140930-5256 FERC PDF (Unofficial) 9/30/2014 2:49:19 PM

IND289-1 | Vincent Curtes Jr, New City, NY.
I really feel the pipeline will help the local economy big time. It will really help with our many energy demands. It will also help defer many of our tax costs. We really need these jobs. Please help us!!!

IND289-1 Comment noted.

IND290 – Andrew Ferraro

20140930-5265 FERC PDF (Unofficial) 9/30/2014 3:07:15 PM	
IND290-1	Andrew S Ferraro, Poughkeepsie, NY. This will give jobs to people to provide them with a decent living wage in local areas. It is also good clean energy with little to no effect on our environment. It will help to provide a better economy in many communities. We really need this work for our safety and families. We need these jobs now please. God Bless You All!!

IND290-1 Comment noted.

IND291 – John Winters

20140930-5261 FERC PDF (Unofficial) 9/30/2014 3:05:34 PM	
IND291-1	John Winters, Wallkill, NC. As a union labor foreman for Local 60, I have worked with Spectra Energy in the past, improving their gas systems. I am looking forward to doing it again in the future.

IND291-1 Comment noted.

IND292 – Zbigniew Lasota

20140930-5259 FERC PDF (Unofficial) 9/30/2014 3:01:24 PM	
IND292-1	Zbigniew Lasota, Newburgh, NY. It will be very good for all of us Union Laborers. It will also bring in much needed jobs training for us also. It is also needed for the Tax revenue it will create locally and also very good for all of our Union working brothers and sisters that need to pay their mortgages and there bills every month like other proud Union workers. Its a win,win,win for everyone I believe. Lets Get R Done!!!

IND292-1 Comment noted.

IND293 – Eduardo Eosia

20140930-5282 FERC PDF (Unofficial) 9/30/2014 3:26:42 PM

IND293-1 | Eduardo J Eosia, Yonkers, NY.
All of us need jobs like these. Not only to bring revenues to the community but to also help our retirees and support our families.

IND293-1 Comment noted.

IND294 – Jose Martinez

20140930-5276 FERC PDF (Unofficial) 9/30/2014 3:18:39 PM

IND294-1 | Jose A. Martinez, Katonah, NY.
This would be a great opportunity for our local #60 members. It would bring many good paying jobs to our members, which is very much needed.

IND294-1 Comment noted.

IND295 – Sergio Baranas

20140930-5279 FERC PDF (Unofficial) 9/30/2014 3:22:51 PM

IND295-1 | Sergio Baranas, New Rochelle, NY.
The Union gives us good training great pay and helps us in this economy as well as helping us when the economy is bad. It will also generate a lot of tax revenue.

IND295-1 Comment noted.

IND296 – Maureen Keenan

20141001-5001 FERC PDF (Unofficial) 9/30/2014 8:56:28 PM

IND296-1 Maureen Keenan, West Roxbury, MA.
I have concerns that the West Roxbury community did not receive adequate notice of this proposal. There are serious safety concerns given its proximity to an active quarry. In addition, there are serious questions with regard to the necessity for this project.

Sincerely, Maureen Keenan

IND296-1 Section 1.1 of the EIS discusses the purpose and need for the Project. See also the responses to comments FA6-1 and FA6-5.

IND297 – Donna Clapsaddle

20141001-5004 FERC PDF (Unofficial) 10/1/2014 1:18:54 AM

IND297-1 Donna Clapsaddle, Ossining, NY.
I oppose the ATM project.
42" diameter huge gas pipeline + nearby nuclear facility with spent rods + intersection with 2000MWe electrical project + Ramapo and Stamford-Peekskill faults + dense population = recipe for disaster. Terrorists wouldn't even have to breach Indian Point, they can set a catastrophe in motion from some point on the pipeline.

This needs major risk assessment.

IND297-1 See the responses to comments FA4-25, SA4-2, SA7-4, and CO7-6.

IND298 – Marie Shopac

20140929-5163(29809954).txt

IND298-1 Marie Schopac, Charlestown, RI.
I am against the expansion of the pipeline for natural gas in Burrillville, RI. Fracked gas is worst than CO2 into the enviroirment.It can ruin the water and the air. It has already leaked and if it leaks again it could explode and the Fire Dept couldn't do anything.

IND298-1 See the response to comment FA4-24.

IND299 – Randy Federighi

20141001-5050 FERC PDF (Unofficial) 10/1/2014 9:01:26 AM

IND299-1 | Randy Federighi, Wappingers Falls, NY.
I support this project because it has good paying union jobs that our members need.

IND299-1 Comment noted.

IND300 – Marco Reis

20141001-5051 FERC PDF (Unofficial) 10/1/2014 9:06:40 AM

IND300-1 | Marco Reis, Holmes, NY.
The Algonquin Pipeline Expansion should really consider Local 60 workers for this project on account of that we are local, certified workers. We have taken safety classes and would do the work responsibly. I support this project.

IND300-1 Comment noted.

IND301 – Fernando Dos Santos

20141001-5052 FERC PDF (Unofficial) 10/1/2014 9:09:30 AM

IND301-1 | Fernando Dos Santos, Lewisville, NC.
I am a supporter of this pipeline project since it will create many jobs for those that haven't worked in a bad economy. Also, since this stretches across three states, NY/CT/RI, it will help improve the infrastructure as well.

IND301-1 Comment noted.

IND302 – Herby Sniffen

20141001-5063 FERC PDF (Unofficial) 10/1/2014 9:15:43 AM

IND302-1 | Herby Sniffen, West Harrison, NY.
I am totally behind this pipeline project, it will help all communities in this area, also put good men to work with minimal impact on our environment plus meet energy demands.

IND302-1 Comment noted.

IND303 – Martin Barajas

20141001-5064 FERC PDF (Unofficial) 10/1/2014 9:19:10 AM

IND303-1 | Martin Barajas, New Rochelle, NY.
I support new good paying jobs and projects that are vital to our economy.

IND303-1 Comment noted.

IND304 – Lineau Dias

20141001-5068 FERC PDF (Unofficial) 10/1/2014 9:27:22 AM

IND304-1 | Lineu P. Dias, Yonkers, NY.
I support this project because it will help meet energy demands with domestic energy, and give a highly skilled and trained workforce good paying jobs.

IND304-1 Comment noted.

IND305 – Deborah Kaufman

20141001-5077 FERC PDF (Unofficial) 10/1/2014 9:38:54 AM

IND305-1 | Deborah Kaufman, Bronx, NY.
I live locally and I support this project.

IND305-1 Comment noted.

IND306 – Paul Lourence

20141001-5079 FERC PDF (Unofficial) 10/1/2014 9:42:42 AM

IND306-1 | Paul J Lourence, Cortlandt Manor, NY.
I support this project because it will create lots of new jobs for my
fellow union brothers and sisters.

IND306-1 Comment noted.

IND307 – Kathleen Bardes

20141001-5080 FERC PDF (Unofficial) 10/1/2014 9:46:19 AM

IND307-1 | Kathleen Bardes, Lake Peekskill, NY.
I support the AIM expansion. I love that there will be minimal
environmental impact with a highly skilled and trained workforce.

IND307-1 Comment noted.

IND308 – Agostino Santos

20141001-5082 FERC PDF (Unofficial) 10/1/2014 9:48:14 AM

IND308-1 | Agostino Santos, Danberry, NY.
I am in favor of the pipeline.

IND308-1 Comment noted.

IND309 – Carlos Perfira

20141001-5081 FERC PDF (Unofficial) 10/1/2014 9:46:31 AM

IND309-1 | Carlos Perfira, Yonkers, NY.
this job will help meet many new energy demands and will have minimal
impact on the environment. The unions will also provide a highly skilled
workforce that works safely.

IND309-1 Comment noted.

IND310 – Rachel Poliner

20140930-0070 FERC PDF (Unofficial) 09/30/2014

FEDERAL ENERGY REGULATORY COMMISSION

ALGONQUIN INCREMENTAL MARKET PROJECT (DOCKET NO. CP14-96-000)

Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below or (3) electronically filed.¹

Please send one copy referenced to Docket No. CP14-96-000 to the address below.

For Official Filing:
 Kimberly D. Bose, Secretary
 Federal Energy Regulatory Commission
 888 First Street, NE, Room 1A
 Washington, DC 20426

SEP 30 A 11:22
FEDERAL ENERGY
REGULATORY COMMISSION

COMMENTS: (PLEASE PRINT) [continue on back of page if necessary]

IND310-1 I'm writing because I'm extremely concerned about the Algonquin pipeline and its West Roxbury Lateral segment. We have had no opportunity to get safety questions answered. For example, what are the safety measures planned given that this new high-pressure pipeline will run next to an active quarry with regular blasting, all in the middle of a densely populated urban neighborhood?

Given that this segment will be new, not replacing old pipeline, shouldn't the comments period be extended to allow for community input and corporate communications?

over→

Commentor's Name and Mailing Address (Please Print)

Rachel Poliner
 44 Clement Ave
 West Roxbury MA 02132

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Sign up" or "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." All comments submitted under eFiling are placed in the public record for the specified docket or project number(s).

IND310-1

See the responses to comments FA6-1, FA6-5, and SA4-5.

IND310 – Rachel Poliner (cont'd)

20140930-0070 FERC PDF (Unofficial) 09/30/2014

IND310-2

- I would also like FERC, Spectra, or National Grid to explain why a pipeline for 3.5 million more homes is needed. Where are these 3.5 million homes? Is this pipeline meant for our use or are we being asked to shoulder the risk for Spectra engaging in export business?
- ③ where is the gas coming from and what are the impacts on the communities where the gas is being pumped.

And I hope you can explain why more gas infrastructure is needed rather than investing in conservation and renewable energy.

Thank you.

IND310-2

The purpose and need for the Project is discussed in section 1.1 of the EIS. Specifically, Algonquin is proposing to construct the AIM Project based on commitments from the Project Shippers, which include local distribution companies and two municipal utilities, which have statutory, regulatory, and/or contractual obligations to serve natural gas customers within their respective service areas in New England. See also the response to comment CO15-4.

IND311 – Jose Manual Goncales DeSilva

20141001-5084 FERC PDF (Unofficial) 10/1/2014 9:50:42 AM

IND311-1 | Jose MANUAL Goncales desilva, yonkers, NY.
I live here and want to see this project go. help meet energy demands
with domestic as well as minimal environmental impact

IND311-1 Comment noted.

IND312 – Donald Gonies

20141001-5086 FERC PDF (Unofficial) 10/1/2014 9:52:51 AM

IND312-1 | Donald Gonies, brewster, NY.
I am for this project because it will help Local 60 members get good
paying jobs.

IND312-1 Comment noted.

IND313 – Victor Duenas

20141001-5085 FERC PDF (Unofficial) 10/1/2014 9:51:12 AM

IND313-1 | Victor Duenas, Manaroneek, NY.
I support this project because it will increase job opportunities in my
area.

IND313-1 Comment noted.

IND314 – Keith Gaddist

20141001-5087 FERC PDF (Unofficial) 10/1/2014 9:52:57 AM

IND314-1 | Keith F Gaddist, Bronx, NY.
This project will help a lot of families people out of work. The upgrade of the pipeline is for the safety of the many little towns and counties. I am pretty sure that these towns and counties that are against the project would not want a major gas leak hazard that could lead so costing someones life. Please help us get these jobs. Thank you.

IND314-1 Comment noted.

IND315 – Mateo Amaya

20141001-5092 FERC PDF (Unofficial) 10/1/2014 10:01:19 AM

IND315-1 | Mateo Amaya, yonkers, NY.
I live here and want to see this pipeline happen..
jobs

IND315-1 Comment noted.

IND316 – Rui Lopes

20141001-5094 FERC PDF (Unofficial) 10/1/2014 10:02:40 AM

IND316-1 | rui lopes, ossining, NY.
I live locally, good paying union jobs and help meet energy demands

IND316-1 Comment noted.

IND317 – Arturo Valencia

20141001-5101 FERC PDF (Unofficial) 10/1/2014 10:15:16 AM

IND317-1 | Arturo Valencia, New Rochelle, NY.
It will good to put people to work and help our economy grow. We really need these jobs. Thanks to all who support this project.

IND317-1 Comment noted.

IND318 – Fabo Gurgo

20141001-5102 FERC PDF (Unofficial) 10/1/2014 10:17:07 AM

IND318-1 | fabo m gurgo, hopewell jnt, NY.
as a member of local 60 I strongly support the expansion to insure great job opportunity and can be very beneficial to the community

IND318-1 Comment noted.

IND319 – Donald Gonies

20141001-5115 FERC PDF (Unofficial) 10/1/2014 10:22:30 AM

IND319-1 | donald gonies, brenster, NY.
this project will be positive in many ways. Union jobs
I live here and want to see this pipeline get approved.

IND319-1 Comment noted.

IND320 – Ilidio Cavalhelro

20141001-5128 FERC PDF (Unofficial) 10/1/2014 10:30:32 AM

IND320-1 | Ilidio Cavalhelro, Danbury, CT.
Work is to be done by highly skilled drug free laborers. This job will also help to raise a lot of tax revenue also. There should be a nice tax revenue raised by this also. The job will also reduce emissions even though they are building the compressor stations larger due to improvements in technology.

IND320-1 Comment noted.

IND321 – Jose Gonzales

20141001-5135 FERC PDF (Unofficial) 10/1/2014 10:38:57 AM

IND321-1 | Jose Gonzales, Port Chester, NY.
Work will be done by highly skilled and trained Union workforce. It will give good paying jobs to people who live here locally.

IND321-1 Comment noted.

IND322 – Pannel Loras

20141001-5137 FERC PDF (Unofficial) 10/1/2014 10:44:10 AM

IND322-1 | Pannel Loras, Mahopac, NY.
This job needs to go right a way for all of us who are struggling in this economy. It will be done by a highly trained workforce and will guarantee the job will be done on time and safe.

IND322-1 Comment noted.

IND323 – Alvaro Cerqueira

20141001-5146 FERC PDF (Unofficial) 10/1/2014 10:49:39 AM

IND323-1 | Alvaro Cerqueira, Cold Spring, NY.
This job will get done using highly skilled and well trained workforce.
And we are looking forward to doing a great job. Please allow us to get
started soon.

IND323-1 Comment noted.

IND324 – Oscot Gonzalez

20141001-5161 FERC PDF (Unofficial) 10/1/2014 10:55:25 AM

IND324-1 | Oscot Gonzalez, Bridgeport, CT.
I really hope that this job gets going soon to provide us with well
paying jobs for our families. Times are really hard right now and we need
this badly.

IND324-1 Comment noted.

IND325 – Eugenio Monteiro

20141001-5172 FERC PDF (Unofficial) 10/1/2014 11:08:40 AM

IND325-1 | Eugenio Monteiro, Yonkers, NY.
This is a good job for all of us who live locally and want to make
decent money

IND325-1 Comment noted.

IND325 – Eugenio Monteiro (cont'd)

20141001-5172 FERC PDF (Unofficial) 10/1/2014 11:08:40 AM

IND325-1
cont'd

We really need this job for our communities. We also need to make this much safer with the new pipeline, these upgrades are well needed. The job will also help generate some really good tax revenues. Thank you

IND326 – Petro Alcalde

20141001-5170 FERC PDF (Unofficial) 10/1/2014 11:02:30 AM

IND326-1 | Petro Alcalde, Yorktown Hts, NY.
I live in Westchester County and really need a good paying job to get caught up on bills. I also want to first hand see that this project is done quickly and safely. It will also create a lot of money through the tax base.

IND326-1 Comment noted.

IND327 – Rodney Hairston

20141001-5174 FERC PDF (Unofficial) 10/1/2014 11:14:27 AM

IND327-1 | Rodney L Hairston, Wappingers Falls, NY.
This job will be very good for our Unions. It will help make the existing pipe that's in the ground much safer. Please allow this job to go through. Thank you,

IND327-1 Comment noted.

IND328 – Lisa Moir

20141001-0024 FERC PDF (Unofficial) 10/01/2014

FEDERAL ENERGY REGULATORY COMMISSION

ALGONQUIN INCREMENTAL MARKET PROJECT (DOCKET NO. CP14-96-000)

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For Official Filing:
 Kimberly D. Bose, Secretary
 Federal Energy Regulatory Commission
 888 First Street, NE, Room 1A
 Washington, DC 20426

ORIGINAL
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 OCT -1 A 10:26
 FEDERAL ENERGY
 REGULATORY COMMISSION

COMMENTS: (PLEASE PRINT) [continue on back of page if necessary]

IND328-1 This proposed project creates a level of risk that is unacceptable to our community and the larger metropolitan area. The location, close to the Indian Point power plant and its dry cask storage facility, and in an active seismic activity zone, I request that the NRC "signs off" on this project with a full study and evaluation BEFORE the FERC approves the project. The potential for disaster amidst a risky Nuclear power plant, residential homes, and the larger NYC metro area is an unconscionable risk. →

Commentor's Name and Mailing Address (Please Print)
 LISA MOIR
 6 Valley Trail
 Croton, NY 10520

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Sign up" or "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." All comments submitted under eFiling are placed in the public record for the specified docket or project number(s).

IND328-1

See the responses to comments FA4-25 and SA4-2.

IND328 – Lisa Moir (cont'd)

20141001-0024 FERC PDF (Unofficial) 10/01/2014

IND328-2

The health risks associated with this project are many. The environmental risks with this project - specifically the levels of Radon released from the Fracked gas and the long list of VOC's, methane, and cancer-causing atmospheric compounds that are released at the compression stations → are not acceptable.

IND328-3

Presently, the dangers of Climate Change are a pressing concern to all countries and all around the world. Approving a project of this size at this level of risk, this close to a nuclear facility → which adds increased methane (which is worse for climate change than Carbon) ~~is~~ ~~is~~ is the wrong choice. ~~Our~~ Our country and its Federal Agencies need to say YES to the people and NO to Big Oil & Profit Companies.

IND328-4

I recommend a baseline Air quality study completed before any FERC approval begins. 72 issues of the ~~earlier~~ DEIS were noted as deficiently addressed. Since then only 42 were subsequently addressed. The FERC needs to extend the comment period, ~~the~~ extensively reviews the DEIS and gain the answers that are missing from DEIS. Fracked gas and investing in fossil fuel projects of this size → is not the direction the FERC should be promoting given the crisis of climate change and the need for projects that are clean non polluting projects.

IND328-2

See the responses to comments SA4-1, SA4-4, SA4-10, and CO7-3.

IND328-3

See the responses to comments FA4-25 and CO7-3.

IND328-4

See the responses to comments FA4-1, FA6-5, SA4-9, and SA4-10.

IND329 – Nancy Fairchild

20140929 09:51:00 PM OFFICE 09/29/2014
S. Neel/precursor
Glastonbury, CT 9/21/14
06033

Dear Ms. Bose

IND329-1 Please deny Spectra
Energy's request for
permit #NAE-2013-1293.
This proposal would
have a detrimental impact
on my home and my
neighborhood. By trying
to install another pipeline
the company would expand
the right away to
include my garages,
part of my home and
would allow them to
cut down most of the
trees between our

ORIGINAL
CPH-96

FILED
SECRETARY OF THE
ENERGY
2014 SEP 29 A 11:26
FEDERAL ENERGY
REGULATORY COMMISSION

IND329-1

The commentor's property would not be affected by the AIM Project. The Project does not involve any proposed new or replacement pipeline within Glastonbury, Connecticut.

IND329 – Nancy Fairchild (cont'd)

20140930-0055 FERC PDF (Unofficial) 09/29/2014

	properties.
IND329-2	When I bought my home in 1978, there was no mention that the pipeline could be expanded - especially by eminent domain!!!
IND-329-3	None of Spectra Energy's propaganda mentions air & water quality or any of the safety issues that concern me and my neighbors... specifically radon. Their information should mention that most of

IND329-2 The terms of an existing easement are beyond the scope of this EIS. The use of eminent domain is discussed in section 4.8.2 of the EIS.

IND329-3 Potential impacts on groundwater and surface water how these impacts would be minimized are described in sections 4.3.1.7 and 4.3.2.6 of the EIS. Air emission impacts and a discussion of the properties and risks associated with radon in natural gas are discussed in section 4.11.1.3. The safety of natural gas transmission systems and Algonquin's safety systems are discussed in section 4.12 of the EIS.

IND329 – Nancy Fairchild (cont'd)

20140930-0055 FERC PDF (Unofficial) 09/29/2014

IND329-4	the pipeline is not populated. However our neighborhood would have home values decrease dramatically! I have been told
IND329-5	that Spectra Energy needs a new larger pipeline so gas can be exported. If this pipeline is just a for profit adventure please deny their request. many thanks Nancy Fairchild

IND329-4 See the response to comment LA23-21.

IND329-5 See the response to comment CO15-4.

IND330 – Judith Kolligian

20140930-0058 FERC PDF (Unofficial) 09/30/2014

FEDERAL ENERGY REGULATORY COMMISSION

ALGONQUIN INCREMENTAL MARKET PROJECT (DOCKET NO. CP14-96-000)

Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below or (3) electronically filed.

Please send one copy referenced to Docket No. CP14-96-000 to the address below.

For Official Filing:
 Kimberly D. Bose, Secretary
 Federal Energy Regulatory Commission
 888 First Street, NE, Room 1A
 Washington, DC 20426

2014 SEP 30 A 11: 22
 FEDERAL ENERGY
 REGULATORY COMMISSION

COMMENTS: (PLEASE PRINT) *[continue on back of page if necessary]*

IND330-1 No Spectra pipeline in Massachusetts, PLEASE !! The huge amount of gas leaks (Boston has 4000, at least in our ISO grid gas infrastructure) need to be fixed. This would provide us with TONS more gas in Mass.

IND330-2 Please urge all colleagues at FERC to see the utter folly of approving NEW FOSSIL FUEL distribution infrastructure. Please heed the UN's and climate scientists' ALARM about HOW BAD the signs of global warming/climate change are. Let's PHASE OUT fossil fuels + forge ahead with renewable energy. your /our children + grandchildren will remember your/our actions on all this !!

Commentor's Name and Mailing Address *(Please Print)*
Judith Kolligian
79 Sheridan Street
Jamaica Plain, Mass. 02130

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(ii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Sign up" or "Register." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." All comments submitted under eFiling are placed in the public record for the specified docket or project number(s).

IND330-1 See the response to comment IND53-2.

IND330-2 Comment noted. See also the responses to comments FL2-2 and CO7-5.

IND331 – Carey Bertrand

20141009-5003 FERC PDF (Unofficial) 10/8/2014 10:08:00 PM

Carey Bertrand, West Roxbury, MA.
Hello FERC,

IND331-1

I write as a resident of West Roxbury and a mother of two school aged children. For your information, there are hundreds, if not thousands of kids who go to school within ONE MILE of the proposed M&R Station. How many M&R Stations have been built next to an active quarry where 13 schools are located ONE MILE AWAY?

The list of the schools is below:

Riverdale School

Joyce Kilmer Lower School

Roxbury Latin School

Catholic Memorial High School

Beethoven School

Chrenberger School

St. Theresa of Avila School

Children's Happy Day School

Parkway Preschool

Lyndon School

Lighthouse School

Kids Club Preschool

YMCA Small Fry Preschool

IND331-1

Comment noted. See response to comment FA6-1. Our analysis concludes that the AIM Project's proximity to the quarry does not constitute a significant risk to the schools listed.

IND332 – Andrea Carlson

20141009-5047 FERC PDF (Unofficial) 10/9/2014 8:08:05 AM	
	Andrea G Carlson, WEST ROXBURY, MA. COMMENTS:
IND332-1	1. The location of the pipeline and Metering and Regulating station (M&R) seem utterly irresponsible given the location relative to an active quarry that blasts a minimum of 1-2 times per week, every week all year long, year after year after year AND the high concentration of homes, residents, and schools. Spectra Energy, National Grid, and the US Federal government must listen to the residents of this area and find a new location.
IND332-2	2. While it may be try that Spectra has followed the legal process outlined for such proposals, it is clear that the process is fundamentally broken. Residents and government officials were not properly informed in a reasonable manner, and there are still too many questions raised by those of us most affected left unanswered. Spectra must change the location to a less risky area OR this process must be delayed until the residents of the area have had their opportunity to get all questions fully answered.
IND332-3	3. An independent evaluation of the proposal must be completed to assess 1) the process that was used was reasonable and fair (which is different than legal) and 2) the safety of the residence in the area if the proposal were to be accepted. The residents of the area already feel that we have no reason to trust Spectra or FERC given the process that was used that did not directly involved those of us most effected.
IND332-4	QUESTIONS: 1. If an explosion happened along any point in the 5 mile pipeline, what would the blast radius be? How many residents and homes would be affected by the blast and the ensuing fires? 2. If an explosion happened at the M&R, what would the blast radius be? How many residents and homes would be affected by the blast and the ensuing fires? 3. In the event of an emergency, how long would it take Spectra and/or National Grid to turn off the gas to through the line and to the M&R to avoid further damage and lost of life? (It took PG&E approximately 1.5-2 hours in the San Bruno Blast.) 4. What safety precautions will be taken to avoid an explosion at any point in the line? 5. What activities and events are likely to cause an explosion along the line or at the M&R? What are Spectra/National Grid doing to prevent such events from occurring? 6. Knowing that promising 100% certainty that no event will occur that results in a major explosion, what percent are you able to promise? What is your SLO (service level objective) for safety?

IND332-1 See the responses to comments FA6-1 and IND236-5.

IND332-2 See the responses to comments FA6-5 and SA4-5.

IND332-3 Section 4.12 of the EIS contains an evaluation of the reliability and safety of the Project. See the responses to comments FA6-5 and SA4-5.

IND332-4 Table 4.12.3.1 of the EIS provides the PIR along the proposed pipeline facilities. The PIR formula is accepted by the PHMSA as an accurate and valid model for determining the distance beyond which a person standing outside in the vicinity of a pipeline rupture and fire would have a 99 percent chance of surviving. The number of residents and homes that would be affected in the event of a pipeline rupture depends upon the location of the rupture and numerous other factors such as whether an individual is sheltered or outside, topography, other structures or landscape features between the individual and the site of the rupture. The PIR along the West Roxbury Lateral is 302.3 feet, as shown in table 4.12.3.1 of the EIS. As discussed in section 4.12.1 of the EIS, PHMSA is responsible for pipeline safety; FERC does not have a "service level objective." The MAOP for the facilities are provided in section 2.1 of the EIS. Pressure relief valves are set to prevent MAOPs from being exceeded. Air emissions from the West Roxbury M&R Station are provided in table 4.11.1-2 of the EIS. We do not agree that providing a list of M&R stations near quarries is a meaningful way to identify safety impacts. We have instead focused on site-specific, engineering-oriented analysis, as described in the response to comment FA6-1. See also the response to comment LA1-10.

IND332 – Andrea Carlson (cont'd)

20141009-5047 FERC PDF (Unofficial) 10/9/2014 8:08:05 AM

IND332-4
(cont'd)

7. What kind of pressure can the pipes withstand before they are compromised and at risk for an explosion or other catastrophe?
8. What kind of emissions will be released from the M&R station, at what frequency and levels? What studies have been done to determine the health risks of such emissions? How will Spectra/National Grid monitor these levels to ensure the safety of the residents in the area?
9. Where have you successfully built and maintained a pipeline of similar length and pressure in a similar environment (M&R so close or closer to an active quarry that is also in such a thickly settle neighborhood - Where else is there an active quarry in the middle of a major city that also has one of your 750psi pipelines running through it?)
10. If my neighbors and I loose our homes and our loved ones due to an explosion or any other issues anywhere along the pipeline or at the M&R, what kind of compensation will we receive? What does your insurance policy for this pipeline and M&R look like?

IND333 – Mary McMahon

20141009-5061 FERC PDF (Unofficial) 10/9/2014 9:25:54 AM

- IND333-1 Mary McMahon, West Roxbury, MA.
The environmental impact statement is not detailed enough for the West Roxbury Lateral Portion of the AIM project. This is a public health issue which endangers all residents. An alternative should be considered.
- IND333-2 Will Spectra be responsible for health and property damage values?
- IND333-3 The property where the facility is located is zoned residential and noted as Marsh. Directly adjacent two homes were removed due damage resulting from the Quarry blasts. A meter station stations at this location, where 2 homes had to be removed, where the quarry blasts in a residential neighborhood is a public health threat.
- IND333-4 Local Town Councils in West Roxbury and Dedham unanimously rejected Spectra at meetings. EIS doesn't address why the Lateral must run through a residential area. Over 60% of abutting homes are in Dedham and West Roxbury out of a multi-state project- a threat to public health and safety.

- IND333-1 See the responses to comments FA6-1, LA5-4, and IND54-9. The safety of natural gas transmission systems and Algonquin's safety systems are discussed in section 4.12 of the EIS.
- IND333-2 Economic impacts associated with the Project, including on property values are discussed in section 4.9.8 of the EIS. See also the responses to comments SA4-10 and LA23-21.
- IND333-3 As discussed in section 4.8.5.3 of the EIS, although this property is identified as "Centre Marsh," the marsh has been classified as "lost" since at least 1990. The property is private, and owned by Algonquin. See also the response to comment FA6-1.
- IND333-4 See the response to comment IND236-5.

IND334 – Renee Hughes

20141009-5069 FERC PDF (Unofficial) 10/9/2014 9:59:12 AM

Renee Hughes, West Roxbury, MA.

My main concerns regarding the pipeline expansion in West Roxbury, MA are the following:

IND334-1

1. Proximity of transfer station and pipeline to West Roxbury Crushed Stone Quarry. I have lived on Woodbrier Road for 25 years, very close to the quarry. The blasting is varied and strong, due to underground veins in the rock. Therefore there is no way to ensure consistent safety to the pipeline and station. Contrary to what reads in the report, we are a heavily packed residential area with an elementary school very close to the quarry/pipeline.

Mr. LoRusso and the quarry officials have been less than truthful over the years. Their promises to the neighborhood have not been kept and they operate with a complete disregard to the surrounding community. I do not trust any information regarding blasting levels. They have changed where they blast and quarry a new area much closer to the station and a crucial bend in the pipe. Their plans include increased truck traffic and a new operation of bringing in contaminated soil for profit.

You must consider an alternate route away from the quarry area. It is a dangerous gamble with our lives. Thus isn't a rural area, it is a densely populated urban neighborhood. Perhaps a more industrial area like Rivermore. The city would part with that land since it just stores archives in the building.

It is a disaster waiting to happen and a foolish choice for FERC to approve this location.

IND334-1

See the response to comment FA6-1.

IND335 – Trieber Family Trust

20141009-5087 FERC PDF (Unofficial) 10/9/2014 10:53:32 AM	
<p>The Trieber Family Trust, West Roxbury, MA. I oppose the proposed West Roxbury Lateral Pipeline and new Metering and Regulating (M&R) Station at Grove and Centre Streets and I believe that this part of the proposal should be abandoned due to the following concerns:</p>	
IND335-1	<p>1. The M&R station is located directly across from an active rock quarry that conducts blasting which places vibration stressors on all surrounding properties. Lateral, not vertical, quarry blasting will be conducted and as the blasting sites move closer and closer to the proposed pipeline and M&R station they will only place more stress on them. More stress will lead to catastrophic ruptures, leaks, and explosions.</p> <p>2. The proposed location of the M&R Station is located on property that once contained multiple houses. The houses were deemed structurally unsound due to damage caused by quarry blasting and were ordered to be demolished. This past evidence proves that this is not a safe site on which to build anything structural, especially a M&R station.</p> <p>3. The heavily loaded quarry trucks that constantly drive over the proposed pipeline will place more stress on the entire pipeline run leading to possible pipeline failure.</p> <p>4. It doesn't make sense to install a high pressure line so close to such a densely populated area. It will jeopardize the safety of the residents and property abutting the proposed pipeline.</p>
IND335-2	<p>5. The proposed pipeline will run close to two elementary schools, the Joyce Kilmer School and the Ludwig Van Beethoven School, affecting the safety of the many children who attend those schools if there is an accident during, before, or after school hours.</p> <p>6. The pipeline is proposed to run directly under a heavily used youth soccer field in Dedham, MA. This is unacceptable and creates a huge safety concern if a leak or explosion occurs.</p>
IND335-3	<p>7. The blowdown events from the M&R station will cause unwanted methane and other chemicals to be released into the environment. These emissions will directly affect a large number of residents in the area of the M&R station as well as produce unwanted greenhouse gases that will affect the atmosphere.</p>
IND335-4	<p>8. Boston favors alternative forms of energy such as renewable energy sources over natural gas and the need for the lateral pipeline is not justified.</p>
IND335-5	<p>9. The streets under which the proposed pipeline is to be installed were just newly repaved. No taxpayer wants to pay twice to have the roads repaved again.</p>

IND335-1 See the response to comment FA6-1.

IND335-2 Section 4.12.1 of the EIS discusses federal safety standards for natural gas pipelines and how these standards are applied in HCAs, such as near schools. Section 4.12.3 of the EIS discusses safety-related concerns and other specific measures that Algonquin has proposed or that we are recommending to further address public safety concerns. In addition, Algonquin has provided additional construction details for Gonzalez Field, which is discussed in section 4.8.5.3 of the EIS.

IND335-3 See the response to comment CO14-54 regarding emissions associated with blowdown events. See the response to comment FA4-23 for additional information regarding Algonquin's efforts to minimize methane emissions from Project facilities.

IND335-4 Your preference for alternative energies such as renewables is noted. See the response to comment FL2-2. A discussion of Algonquin's stated need for the proposed facilities is included in section 1.1 of the EIS.

IND335-5 The potential effect of the Project on local roadways along the West Roxbury Lateral is discussed in section 4.9.5 of the EIS. Any needed repairs to the roadways resulting from Project construction would be the responsibility of Algonquin.

IND335 – Trieber Family Trust (cont'd)

20141009-5087 FERC PDF (Unofficial) 10/9/2014 10:53:32 AM

IND335-6 10. A recent survey conducted by the West Roxbury Patch, a local online news source, found that more than 80% of residents oppose the plan as well as state senators, state representatives, Boston city councilors, and the affected neighborhood associations.

IND335-7 11. The added traffic, noise, and public safety issues are a major concern to the residents along and near the proposed pipeline route and residents are not in favor of the proposal. The opposition was clearly voiced, demonstrated, and recorded at each of the public meetings that were held concerning this proposal.

Thank you for considering these comments in your decision making process.

IND335-6 Comment noted.

IND335-7 Section 4.11.2 of the EIS presents an assessment of noise impacts from the Project. Public safety issues are addressed in section 4.12 of the EIS.

IND336 – Michael Walsh

20141009-5090 FERC PDF (Unofficial) 10/9/2014 11:06:21 AM

Michael Walsh, West Roxbury, MA.
IND336-1 I am flabbergasted at the lack of thought for the impact of this project on my community. There are many viable alternatives to putting a Gas Metering Station in the middle of a Boston neighborhood beside an active quarry that blasts ledge weekly. They are taking the easiest path for them and the FED is implicit in helping AIM shove it down our throats.
IND336-2 This project will adversely affect the quality of our lives and health for years. How about our property values plummeting? Who will buy a house near a potential powder keg? This is classic example of Big Business with the backing of Special Interest Government screwing an American Community full of voters. This project would have never seen the light of day if we had been properly informed at the out set. Please Please Please rethink this horrible project.
IND336-3

IND336-1 See the response to comment FA6-1.

IND336-2 Economic impacts associated with the Project, including property values are discussed in section 4.9.8 of the EIS. See also the response to comment LA23-21.

IND336-3 Comment noted. See also the response to comment FA6-5.

IND337 – Lori Krasner

20141009-5092 FERC PDF (Unofficial) 10/9/2014 11:22:02 AM

Lori E. Krasner, West Roxbury, MA.
To Whom It May Concern,
IND337-1 I am extremely dismayed and concerned about the Algonquin Pipe Line, and specifically, the West Roxbury Lateral, which will place a high pressure transmission line in a heavily populated area next to a quarry that blasts on a regular basis. Further, though Spectra claims there has been adequate information shared, these plans seem to have been made with little public input or discussion. There are many questions to be answered. I am deeply concerned about the safety of this project and
IND337-2 adamantly oppose moving further with it until there has been adequate review, community engagement,
IND337-3
Lori E. Krasner

IND337-1 See the response to comment FA6-1.

IND337-2 See the response to comment FA6-5.

IND337-3 Section 4.12.1 of the EIS discusses federal safety standards for natural gas pipelines and how these standards are applied in HCAs. Section 4.12.3 of the EIS discusses safety-related concerns and other specific measures that Algonquin has proposed or that we are recommending to further address public safety concerns.

IND338 – Steve Hopkins

20141007-0030 FERC PDF (Unofficial) 10/07/2014

Peak Ave 62B
Rte NY 10580

ORIGINAL

10/24/14

C.F. 14-96-000

2014 OCT -7 A 11:53

Dist Mr. Bass,

I am very concerned about the
AIM gas pipeline expansion for the
following reasons,

IND338-1

1. The proximity of this 42" line
to the Indian Point nuclear
Power Plant and the 40 years of
spent nuclear fuel stored at the
plant. If the line were to rupture,
the results would be catastrophic.

IND338-2

2. The necessary compressor stations
would be extremely disruptive to
local residents in terms of noise and
gas leaks. Many people are very
sensitive to even low doses of meth-
ane. Some would probably have to
move away.

IND338-3

3. Much of gas from Pennsylvania has
radon gas mixed in, presenting a serious
health risk.

IND338-4

4. Please conduct an extensive environ-
mental study of this project before
it is considered.
Steve Hopkins

IND338-1

See the response to comment FA4-25.

IND338-2

See the response to comment IND85-57 regarding noise impacts. We note that all of the compressor stations for this Project are existing. See the responses to comments FA4-23 and CO7-3 regarding methane emissions and minimization efforts.

IND338-3

See the response to comment SA4-4.

IND338-4

Section 4.0 of the EIS provides a detailed environmental analysis of the AIM Project. See also the response to comment FA4-1.

IND339 – Christy Chambers

20141010-5002 FERC PDF (Unofficial) 10/9/2014 5:15:05 PM

Christy Chambers, West Roxbury, MA.
Christy Chambers
145 Stimson St.
West Roxbury, MA 02132

Email: christylu3@aol.com

RE: Docket CP14-96 West Roxbury Lateral Pipeline

IND339-1 As a close resident of the proposed West Roxbury Lateral Pipeline, I have many concerns.

We were not aware of this situation until just recently.

Why is a M&R station being proposed across from an active quarry which blasts frequently in a densely populated area?

IND339-2 Why aren't there other proposed sites which are away from the quarry and densely populated area?

IND339-3 There have been many fatal accidents on this stretch of road.

Many years ago there was a house built in this area. It was badly damaged from the frequent blasting which caused the people to move out and sell their property to the Quarry. This is the same site of the proposed M&R station.

I do not want this neighborhood destroyed by a explosion like the one in San Bruno, California.

IND339-4 Spectra needs to find another more secluded site for this M&R station with gas pressure of 750 psi.

IND339-1 See the responses to comments FA6-1 and FA6-5.

IND339-2 See the response to comment IND236-5.

IND339-3 See the response to comment FA6-1.

IND339-4 See the response to comment IND236-5.

IND340 – Joanne Tisei

	20141010-5116(29843693).txt
	JOANNE TISEI, WEST ROXBURY, MA. I live in the area where the M and R station and new pipeline will be coming in and oppose this site for the M and R station. This is a highly populated area in Boston, with 4 schools, a senior housing, a nursing facility and two public venues located in its path. There was not enough research on FERC in determining the risk to community, person, environment and safety. I have some questions and statements for you to consider.
IND340-1	1. How many M and R stations have been constructed across from and active blasting quarry?
IND340-2	2. How many M and R stations have been built in a residential neighborhood?
IND340-3	3. What longitudinal studies have been done on M and R stations and the health impact on people living next to it or within 1/4 mile?
IND340-4	4. Is this going to be a vaulted M and R station?
IND340-5	5. Where will the drainage of particles and liquids from the M and R stations be kept in contained. Is this a sump system? Are these potentially toxic materials?
IND340-6	6. Is FERC aware that Algonquin purchased this residential land from the quarry who is now voicing "concerns"?
	7. Is FERC aware that this residential land once held houses which were severely damaged from the active blasting and homes were purchased by the quarry as a result of this?
IND340-7	8. Has there been a study of the vibrations of this particular plot of land of underground and sonic vibrations?
	9. Is FERC aware that homes shake 1/2 mile away when blasting occurs and that homes in the area have structural damage ongoing?
IND340-8	10. What happens if there is a pipe that blows or is damaged due to the blasting?
IND340-9	11. What is the actual buffer zone of the M and R station to the abutting homes and streets?
IND340-10	12. Has a representative from FERC actually come to the neighborhood to do a walk through or drive through?
IND340-11	13. 150 trucks arrive in and out of the quarry daily. Is FERC aware of this and how will this impact the construction and vibrations of the ground?
IND340-12	14. How many M and R accidents have happened in the last 10 years?

IND340-1	We do not agree that providing a list of M&R stations near quarries is a meaningful way to identify safety impacts. We have instead focused on site-specific, engineering-oriented analysis, as described in the response to comment FA6-1.
IND340-2	Meter stations and natural gas pipeline infrastructure are commonly located in residential and/or urban areas to provide an interconnection with local distribution companies who deliver the gas to users. See also the responses to comments FA6-1, SA4-5, and IND340-1.
IND340-3	See the response to comment SA4-10.
IND340-4	No, the West Roxbury M&R Station would be an aboveground facility, not an underground, vaulted facility.
IND340-5	The M&R station would be constructed to all applicable regulations and in accordance with a SWPPP.
IND340-6	We are not aware from whom Algonquin purchased the site of the proposed M&R Station, but that information does not appear relevant to our impact analysis. See the response to comment FA6-1.
IND340-7	See the response to comment FA6-1.
IND340-8	A pipeline rupture is a serious event no matter what the cause. Our analysis concludes that blasting at the quarry would not jeopardize the pipeline system's integrity. See the response to comment FA6-1. Section 4.12.1 of the EIS discusses federal safety standards for natural gas pipelines and how these standards are applied in HCAs. Section 4.12.3 of the EIS discusses safety-related concerns and other specific measures that Algonquin has proposed or that we are recommending to further address public safety concerns.
IND340-9	Section 4.8.7.2 of the EIS has been updated to recommend that Algonquin provide a site-specific landscaping plan to minimize visual impacts at the West Roxbury M&R Station. This plan would depict the specific location of the proposed facility within the property. See also the response to comment SA13-13.
IND340-10	Yes, FERC staff conducted a site visit of the area in August 2013. See also the response to comment FA6-5.
IND340-11	Section 4.9.5.2 and appendix G of the EIS have been updated to include additional information on potential traffic-related impacts and measures to be implemented to prevent unnecessary delays to the motoring traffic during construction of the West Roxbury Lateral. We also note an existing natural gas distribution pipeline is located in the street between the proposed pipeline/M&R Station and the quarry, which is subject to the same quarry truck traffic.
IND340-12	Table 4.12.2-1 of the EIS provides data on the significant incidents associated with natural gas transmission pipeline systems (including pipelines, compressor stations, and M&R stations). The specific information requested for M&R stations is not available.

IND340 – Joanne Tisei (cont'd)

IND340-13	15. How deep will the pipes be laid? Will they be next to the old pipes?
IND340-14	16. Studies have shown that the old pipes will contain toxins and will need to be removed with specific guidelines. Who will oversee this and how will it be done?
	17. If the pipes are not going to be removed the rattling and movement will cause additional leakage. How will this be handled?
IND340-15	18. Are you aware that many of the homes have septic systems do the ledge and rocks?
IND340-16	19. I have been told that our gas pipes were laid shallower than other parts of the city? Is this true for where the pipeline goes?
	20. How will this effect the laying of the pipes?
IND340-17	21. If there is ledge where the pipes are to be put how will this be handled?
IND340-18	22. There is known radon on ledge and rock. In addition methane and radon levels do get released from these pipes. How has this been documented and looked into?
IND340-19	23. Have monies been set aside for compensatory funds for families, business and the community for the impact and potential hazards?
IND340-20	24. Has FERC met with the schools and community services re: the impact on school functioning and evacuation plans?
IND340-21	25. Who will foot the bill for evacuation plans and potential events of life and limb harm?
IND340-22	26. 4 acres of urban tree canopy will be disrupted? What is the impact study on the coyotes, hawks, wild turkeys, frog, salamanders and protected species?
IND340-23	27. There are questions re: wet land and vernal pool?
IND340-24	28. Where is the archaeological impact study. Was any native American group approached in the Boston area about this. This was a fishing and gathering ground for the Charles River and Basin and what will be the procedure for documenting and such artifacts?
IND340-25	29. This area is a dormant volcano so the rock formations, soil, ledge and etc. is unique. Is FERC aware of this. AS a resident I am quite concerned over the communication, community and state input Page 1

IND340-13	The construction procedures for the Project are described in section 2.0 of the EIS. Section 4.12 of the EIS describes the safety measures that would be implemented, including depth of burial, for the pipeline.
IND340-14	Section 4.8.6.2 of the EIS discusses the process by which Algonquin proposes to remove and dispose of potentially contaminated piping or equipment in New York and Connecticut. However, we note that Algonquin does not own or operate any existing pipelines along the West Roxbury Lateral. The West Roxbury Lateral is a new pipeline that would not replace any existing infrastructure.
IND340-15	Comment noted. The majority of the West Roxbury Lateral would be located within streets, avoiding impacts on most residential property and septic systems.
IND340-16	All other utilities in the vicinity of where the Project facilities would be installed would be identified before construction. Section 2.3.1.2 of the EIS discussing construction methods near existing utilities.
IND340-17	We are not sure we understand this comment. If the comment refers to placing the pipe across ledges of rock, excavation of the trench would ensure that the pipe is laid in a flattened trench bottom.
IND340-18	See the response to comment SA4-4.
IND340-19	See the response to comment LA1-10.
IND340-20	All stakeholders have had the opportunity to participate in the review process. See also the response to comment SA4-5.
IND340-21	See the responses to comments LA1-4, LA1-9, and LA1-10.
IND340-22	Urban environments are characterized by a low diversity of wildlife species that are tolerant of human development and activity. Impacts on protected species would be coordinated with the FWS and state and local jurisdictional agencies, as required.
IND340-23	Comment noted. Potential impacts and mitigation measures to minimize impacts on wetlands (including vernal pools) are discussed in section 4.4.3 of the EIS.
IND340-24	Algonquin completed a cultural resources survey of the Project, which was reviewed by a number of State Historic Preservation Officers, including the Massachusetts Historical Commission (see section 4.10.2.4 of the EIS). The FERC consulted with federally-recognized Indian tribes to identify concerns and areas of traditional religious or cultural significance within the project area (see section 4.10.1.3 of the EIS).
IND340-25	Surficial geology crossed by the Project is discussed in section 4.1.2 and the bedrock geology in section 4.1.3 of the EIS.

IND340 – Joanne Tisei (cont'd)

IND340-26 20141010-5116(29843693).txt
and lack of human concern over this project. This community is in need of National
Grid to upgrade our ancient pipes. However, this is not an upgrade but a money
making project for Algonquin and National Grid. The need to increase capacity for
energy is real. However, putting it through a neighborhood is ill planned.
Sincerely, Joanne Tisei, West Roxbury, Ma 02132

IND340-26

Comment noted.

IND341 – Judy Jose-Roddy

20141010-5012 FERC PDF (Unofficial) 10/9/2014 8:29:52 PM

IND341-1 Judy Jose-Roddy, WEST ROXBURY, MA.
I am writing to voice my concerns with regard to the proposed natural gas pipeline expansion in West Roxbury, MA known as the AIM West Roxbury Lateral. I understand that the expansion is proposed for the purpose of increasing the natural gas supply in this area to meet demand. Although I would prefer to see those energy demands met through renewable sources, I am not necessarily opposed to a natural gas pipeline expansion. I do believe this particular plan is dangerously flawed because of the location of the pipeline through densely populated areas, and especially because of the location of the Metering and Regulating Station directly across from an active quarry. It seems there are other much more appropriate, less risky and dangerous routes available to get the pipeline from the same point A to the same point B. Was the existing route chosen simply because this was the land that Spectra was able to acquire prior to the proposal being made? Why not route the pipeline up the median strip of the VFW Parkway, a bit further removed from residences and businesses? Why not follow the river, near where National Grid leases their facility now on Rivermoor? The Stonybrook Reservation offers wilderness, about as far removed from residences and businesses as you can get within the city limits, traveling an almost parallel route to the one proposed. What alternatives were considered, if any, and why were they discarded?

IND341-3 Last year there were two gas explosions near the site of the proposed M & R Station. These occurred in the vicinity of an elementary school. Residents in the area regularly experience shaking and rattling homes, sometimes falling ceilings and more, from the regular blasting that goes on at the quarry. This blasting moves houses and moves rocks and disrupts the bedrock around the quarry. If a pipeline is there, and an M & R facility, they would likely be impacted by this shifting. It seems that it will be a matter of when, not if, an accident or explosion would happen. The specific site of the proposed M & R Station was formerly the site of a house that was badly damaged by the ongoing blasting at the quarry. The blasting continues. 150 - 300 trucks per day move in and out of the quarry. The other factor here is that the quarry is surrounded by a densely populated residential community and at least two elementary schools. How can this be the ideal location for the M & R Station? The 2010 San Bruno gas explosion of a pipeline (that was a lower pressure line than the one proposed for West Roxbury) illustrates just how dangerous this supposedly safe engineering can be. Thank you for carefully considering these concerns. I hope that you will choose to not allow the current proposal.

IND341-1 Comment noted. See also the response to comment FL2-2.

IND341-2 See the response to comment FA6-1. Alternatives considered are described in section 3.0 of the EIS.

IND341-3 See the response to comment FA6-1. Section 4.12.1 of the EIS discusses federal safety standards for natural gas pipelines and how these standards are applied in HCAs. Section 4.12.3 of the EIS discusses safety-related concerns and other specific measures that Algonquin has proposed or that we are recommending to further address public safety concerns.

IND342 – Ruifeng Li

20141010-5017 FERC PDF (Unofficial) 10/9/2014 10:02:12 PM

- IND342-1 Ruifeng Li, West Roxbury, MA.
I oppose the proposed West Roxbury Lateral Pipeline and new Metering and Regulating (M&R) Station at Grove and Centre Streets because of my following concerns:
- IND342-2 (1) public safety. This is a very densely populated area with many schools within a mile such as Joyce Kilmer Elementary school, where my two children go.
- (2) public health. As a Harvard school of public health researcher, I am aware the bad effect with pollutants on human health, especially Children. The blowdown events from the M&R station will cause unwanted methane and other chemicals to be released into the environment. These emissions will directly affect the health of a large number of residents in the area of the M&R station as well as produce unwanted greenhouse gases that will affect the atmosphere.
- IND342-3 (3) quality of life. Since June of 2014, we have been suffered the noise, traffic congestion, and the danger due to the National Grid project. We don't want to suffer twice. We need our life back to normal.
- IND342-4 (4) necessity of the location. There is some other industrial areas from Westwood to West Roxbury, so please consider to relocate the pipeline if it really is a need for natural gas for West Roxbury.

Thank you for considering these comments in your decision making process.

IND342-1 See the responses to comments FA6-1 and SA4-5.

IND342-2 Methane is not toxic, but is classified as a simple asphyxiate, possessing a slight inhalation hazard. However, when released into the atmosphere, sufficient air mixing would occur to negate this hazard. See also the responses to comments FA4-23, SA4-10, and CO7-3.

IND342-3 Comment noted. See the response to comment IND340-11.

IND342-4 See the response to comment LA24-3.

IND343 – Linda Denekamp

20141010-5057(29842182).txt	
Linda Denekamp, West Roxbury, MA. To Whom It May Concern:	
IND343-1	I am very opposed to the proposed location of the AIM expansion pipe and especially transfer station in West Roxbury. I am a lifelong Boston resident who grew up and live in West Roxbury. My Mother has lived on Glenhaven road since 1920's and still owns her home there. Glenhaven Road is in very near proximity to proposed transfer station and I am very familiar with this site.
IND343-2	My Main concern is the proximity to West Roxbury Crushed stone and the active quarry there. We have lived with the Quarry blasts my whole life and they can be felt for miles- in spite of safety limits the Quarry states it follows! I have felt the blasts and witnessed the cracked ceilings. I also know that many gas pipes in the area have had leaks- and these are not high pressure pipes. This is a BAD LOCATION!! I am very concerned about effects of a large high pressure gas line running in close proximity to this blasting. Regardless of the strength of the pipe, the shifting of ground beneath and proximal to the pipe has potential to damage the pipeline.
IND343-3	Second, this area has become increasingly congested. It is highly residential and highly populated with Joyce Kilmer School on Baker Street in close proximity. The volume of traffic has steadily increased from residents but also from School buses and especially from West Roxbury crushed stone trucks. It is also a city bus route. There have been multiple accidents at the corner of Centre and Grove Streets. Increased activity from the transfer station will have a negative effect on resident safety as well as traffic congestion.
IND343-4	Third, I know that there are some emissions of gas from the Transfer station that would be a public health risk. This is especially concerning in a neighborhood where many children live as well as go to school.
IND343-5	Fourth, I am concerned about property value in the area as new homebuyers will not be shopping for homes near a gas transfer station. There have been documented incidents of homes and property destroyed by gas leaks. I choose not to have gas as an energy source and do not want to be forced into living near a gas plant.
IND343-6	There has been little to no public hearings about this proposal until recently and as a neighbor of that property (Glenhaven Road) My mother received no notice. I was able to learn of this project only recently and attended one meeting last night where the vast majority of attendees from West Roxbury were adamantly opposed to the location of this project. To our knowledge, no alternative sites were considered or investigated.
IND343-7	I urge you to not move forward with this project until an alternate safe site is found- this is a dangerous location!
Linda Denekamp, MS RN 177 Wren St West Roxbury, MA 02132 617-327-4445 Elizabeth Denekamp 18 Glenhaven Rd West Roxbury, MA 02132 617-325-3467	
Page 1	

IND343-1 Comment noted.

IND343-2 See the response to comment FA6-1.

IND343-3 Section 4.9.5.2 and appendix G of the EIS have been updated to include additional information on potential traffic-related impacts and measures to be implemented to prevent unnecessary delays to the motorist traffic during construction of the West Roxbury Lateral. See also the response to comment SA4-5.

IND343-4 See the response to comment IND342-2.

IND343-5 Economic impacts associated with the Project, including property values, are discussed in section 4.9.8 of the EIS. See also the response to comment LA23-21.

IND343-6 See the response to comment FA6-5. Alternatives are discussed in section 3.0 of the EIS.

IND343-7 See the responses to comments LA14-2, LA24-3, IND 236-5, A1-2, and A2-5.